

Message

From: Bond, Alexander [ABond@eei.org]
Sent: 8/22/2019 9:18:47 PM
To: Wright, Peter [wright.peter@epa.gov]
CC: Hoverman, Taylor [hoverman.taylor@epa.gov]; Cook, Steven [cook.steven@epa.gov]
Subject: Extension Request for CERCLA 108(b) Proposal
Attachments: 108bCommentPeriodExtensionRequest_Final.pdf

Dear Assistant Administrator Wright:

Please find attached here a request for a 60-day extension of the public comment period for the Environmental Protection Agency's proposal to not establish financial assurance requirements for facilities in the Electric Power, Generation, Transmission and Distribution Industry under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) section 108(b). 84 *Fed. Reg.* 36,535 (July 29, 2019). We believe that an additional 60 days will help commenters fully develop legal and technical explanations for EPA to consider, that the additional time will also allow commenters to fully evaluate several parts of the existing record in light of the recent decision in *Idaho Conservation League et. al. v. Wheeler*, and also help commenters contextualize a number of specific situations regarding ongoing industry proceedings.

Please don't hesitate to reach out with any questions. Thank you!

Edison Electric Institute
Utility Solid Waste Activities Group
National Association of Manufacturers
National Mining Association
Society of Chemical Manufacturers and Affiliates
American Fuel & Petrochemical Manufacturers
Industrial Minerals Association – North America
The Fertilizer Institute

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Alex Bond
Associate General Counsel, Energy & Environment
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2696
202-508-5523
www.eei.org

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August 22, 2019

The Honorable Peter Wright
Assistant Administrator, Office of Land and Emergency Management
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Assistant Administrator Wright:

The undersigned organizations write to request a 60-day extension of the public comment period for the Environmental Protection Agency's (Agency) proposal to not establish financial assurance requirements for facilities in the Electric Power, Generation, Transmission and Distribution Industry under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) section 108(b) (CERCLA 108(b) Rule or Rule). 84 *Fed. Reg.* 36,535 (July 29, 2019).

The proposed CERCLA 108(b) Rule contains numerous complex technical and environmental impact analyses that the undersigned organizations and their members are actively evaluating. Accordingly, additional time will benefit the regulated public in developing meaningful comments on the Rule's highly technical and complex issues. Further, both the regulated public and the Agency need additional time to evaluate the potential impacts on the proposed Rule of the U.S. Court of Appeals for the District of Columbia Circuit's (D.C. Circuit) recently-issued decision of first impression regarding the use of CERCLA section 108(b) for the hard rock mining industry in *Idaho Conservation League et. al. v. Wheeler*. 2019 WL 3242390 (July 19, 2019).

An extension of the public comment period is critical to allowing the public to engage in a meaningful legal, technical, and scientific analysis of the proposed Rule, and a 60-day extension would still allow the Agency almost a full year to complete review of the comments and issue a final rule within the timeframe required by the consent decree entered by the D.C. Circuit.

Accordingly, we believe that at least a 60-day extension of the comment period is both warranted and reasonable.

Sincerely,

Edison Electric Institute
Utility Solid Waste Activities Group
National Association of Manufacturers
National Mining Association
Society of Chemical Manufacturers and Affiliates
American Fuel & Petrochemical Manufacturers
Industrial Minerals Association – North America
The Fertilizer Institute

* * * * *

The Edison Electric Institute (EEI) is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 60 international electric companies, with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

The Utility Solid Waste Activities Group (USWAG), formed in 1978, is an association of over one hundred and thirty electric utilities, power producers, utility operating companies, utility service companies located throughout the United States, and their trade associations. Together, USWAG members represent more than 73% of the total electric generating capacity of the United States, and service more than 95% of the nation's consumers of electricity.

The National Association of Manufacturers (NAM) is the largest manufacturing association in the United States, representing small and large manufacturers in every industrial sector and in all 50 states. Manufacturing employs more than 12.8 million men and women, contributes \$2.38 trillion to the U.S. economy annually, has the largest economic multiplier of any major sector and accounts for more than three-quarters of private-sector research and development. The NAM is the powerful voice of the manufacturing community and the leading advocate for a policy agenda that helps manufacturers compete in the global economy and create jobs across the United States.

The National Mining Association (NMA) is a national trade association that includes the producers of most of the nation's coal, metals, industrial and agricultural minerals; the manufacturers of mining and mineral processing machinery, equipment and supplies; and the engineering and consulting firms, financial institutions and other firms serving the mining industry.

The Society of Chemical Manufacturers and Affiliates (SOCMA) is the national trade association dedicated to the specialty and fine chemical industry. Founded in 1921, SOCMA represents a diverse membership of chemical companies who manufacture unique and innovative chemistries used in a wide range of commercial, industrial and consumer products. SOCMA supports its members through programs and services that maximize commercial opportunities, enhance regulatory and legal compliance, and promote industry stewardship.

American Fuel & Petrochemical Manufacturers (AFPM) is a trade association representing virtually all the U.S. refining and petrochemical manufacturing capacity. Our members produce the fuels that drive the U.S. economy and the chemical building blocks integral to millions of products that make modern life possible.

The Industrial Minerals Association – North America (IMA-NA) is a nonprofit trade organization representing industrial minerals producers throughout the United States, Canada, and Mexico. IMA-NA represents a diverse set of member companies engaged in mining and processing of ball clay, barite, bentonite, borates, calcium carbonate, diatomite, feldspar, industrial sand, kaolin, soda ash, talc, and wollastonite across the country. As a group, industrial minerals are vital to the manufacturing processes for most of the products we use every day. They are used in the production of glass, ceramics, paper, plastics, rubber, detergents, insulation, pharmaceuticals, and cosmetics. They also are used in foundry cores and molds used for metal castings, paints, filtration, metallurgical applications, refractory products, and specialty fillers. Every sector of industry relies on a variety of industrial minerals to generate their end products, making a robust and stable supply chain critical for the continued growth and success of our economy.

The Fertilizer Institute (TFI) represents fertilizer manufacturers, transporters, wholesalers, brokers and retailers. Our members provide nutrients that are responsible for nearly half of a crop's yield, helping to ensure a stable and reliable food supply. The fertilizer industry supports nearly 500,000 American jobs and has an economic impact of over \$150 billion annually.

Message

From: Foley, Allison D. [ADFoley@Venable.com]
Sent: 11/1/2019 8:29:13 PM
To: Swetland-Johnson, Karen [Swetland-Johnson.Karen@epa.gov]
CC: Johnson, Barnes [Johnson.Barnes@epa.gov]; ORCRPCBs [ORCRPCBs@epa.gov]; 'jim.roewer@uswag.org' [jim.roewer@uswag.org]; Dixon, Koren [kdixon@eei.org]; O'Sullivan, Chelsea E. [CEOSullivan@Venable.com]
Subject: On behalf of USWAG member companies: (email 1 of 6) Letters requesting inclusion on PCB remediation waste disposal approval
Attachments: 2019.11.01_Cover letter re USWAG member approval request letters.pdf; Summary USWAG Member Companies Requesting Inclusion on PCB Remediation W....pdf; 1 of 6_PCB Approval Request Letters.pdf

Dear Ms. Swetland-Johnson:

As requested, attached please find letters from USWAG member companies requesting inclusion on the PCB remediation waste disposal approval originally issued in June 2014. Today's electronic submission is broken into six parts, due to file size; we are sending hard copies of these materials in a single submission as well, which you should receive early next week.

In this first of six emails, please find:

- A cover letter explaining the submission;
- A summary chart reflecting all member companies requesting inclusion on the Approval as part of today's submission; and
- The first of six pdf portions of the bundled request letters.

In addition, please note that, due to unforeseen circumstances, USWAG member Duquesne Light Company (Pittsburgh, PA) was not able to provide the company-specific request letters in time for today's submission. They have been working to prepare the request and will send it directly to you next week, with the hope of being included (together with the companies reflected in the attached materials) in the next round of the approval issued for public comment. We apologize for any inconvenience and thank you for considering their request.

Please let me know if you have questions regarding these materials, or if you do not receive all six email segments.

Best,

Allison D. Foley, Esq. | Venable LLP
t 202.344.4416 | f 202.344.8300 | m 845.797.6635
600 Massachusetts Avenue, NW, Washington, DC 20001

ADFoley@Venable.com | www.Venable.com

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October 14, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include AEP Ohio on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

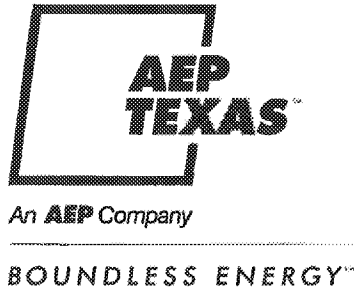
AEP Ohio, headquartered at 700 Morrison Road, Gahanna, Ohio 43230 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AEP Ohio on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, AEP Ohio would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AEP Ohio locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AEP Ohio's cleanup activities while remaining protective of the environment.

You may contact Daniel E. Mains, P.E., Environmental Engineer Senior at demains@aep.com and/or 614-716-3374 for information regarding this application and PCB spill cleanup and disposal activities conducted by AEP Ohio.

Thank you for your attention to this matter.

Sincerely,

David A. Miller, P.E.
Director of Land Environment & Remediation Services



October 14, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include AEP Texas on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

AEP Texas, headquartered at 539 N. Carancahua Street, Corpus Christi, Texas 78478 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AEP Texas on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, AEP Texas would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AEP Texas locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AEP Texas' cleanup activities while remaining protective of the environment.

You may contact Daniel E. Mains, P.E., Environmental Engineer Senior at demains@acp.com and/or 614-716-3374 for information regarding this application and PCB spill cleanup and disposal activities conducted by AEP Texas.

Thank you for your attention to this matter.

Sincerely,

David A. Miller, P.E.
Director of Land Environment & Remediation Services



AES Alamos, LLC
690 N. Studebaker Rd.
Long Beach, CA 90803
Phone: (562) 493-7891
Fax: (562) 493-7737

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include AES Alamos, LLC on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

AES Alamos, LLC, headquartered at 690 North Studebaker Road, Long Beach, California, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AES Alamos, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, AES Alamos, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AES Alamos, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AES Alamos, LLC's cleanup activities while remaining protective of the environment.

You may contact Jose Perez, Operations Manager, jose.perez@aes.com or Jim Beach, Maintenance Manager, jim.beach@aes.com for information regarding this application and PCB spill cleanup and disposal activities conducted by AES Alamos, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Miller".

Jeff Miller
Compliance Manager
AES Southland



AES Huntington Beach, LLC
21730 Newland Street
Huntington Beach, CA 92646
Phone: (714) 374-1476
Fax: (562) 493-7737

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include AES Huntington Beach, LLC on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

AES Huntington Beach, LLC, headquartered at 21730 Newland Street, Huntington Beach, California, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AES Huntington Beach, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Huntington Beach, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AES Huntington Beach, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AES Huntington Beach LLC's cleanup activities while remaining protective of the environment.

You may contact Jose Perez, Operations Manager, jose.perez@aes.com or Jim Beach, Maintenance Manager, jim.beach@aes.com for information regarding this application and PCB spill cleanup and disposal activities conducted by AES Huntington Beach, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Miller", written over a horizontal line.

Jeff Miller
Compliance Manager
AES Southland



September 25, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include AES Ohio Generation, LLC on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

AES Ohio Generation, LLC, headquartered at 1065 Woodman Drive, Dayton, Ohio 45432 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AES Ohio Generation, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, AES Ohio Generation, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AES Ohio Generation, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AES Ohio Generation, LLC's cleanup activities while remaining protective of the environment.

You may contact me at dan.sweeney@aes.com or 937-259-7716 for information regarding this application and PCB spill cleanup and disposal activities conducted by AES Ohio Generation, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel W. Sweeney". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel W. Sweeney
Director, Site Liability Management



AES Redondo Beach, LLC
1100 N. Harbor Drive
Redondo Beach, CA 90277
Phone: (310) 318-7491
Fax: (562) 493-7736

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include AES Redondo Beach, LLC on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

AES Redondo Beach, LLC, headquartered at 1100 N Harbor Drive, Redondo Beach, California, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AES Redondo Beach, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Redondo Beach, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AES Redondo Beach, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AES Redondo Beach LLC's cleanup activities while remaining protective of the environment.

You may contact Jose Perez, Operations Manager, jose.perez@aes.com or Jim Beach, Maintenance Manager, jim.beach@aes.com for information regarding this application and PCB spill cleanup and disposal activities conducted by AES Redondo Beach, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Miller", written over a horizontal line.

Jeff Miller
Compliance Manager
AES Southland



600 N. 18th Street
Birmingham, AL 35203
205 257 4462 tel
205 257 4349 fax
205-767-6471 cell
sctrippa@southernco.com

October 17, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Alabama Power Company on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Alabama Power Company, headquartered at 600 North 18th Street, Birmingham, Alabama, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Alabama Power Company on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Alabama Power Company would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Alabama Power Company locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Alabama Power Company's cleanup activities while remaining protective of the environment.

You may contact Sharon Trippany, Environmental Affairs Specialist at sctrippa@southernco.com or 205-257-4462 for information regarding this application and PCB spill cleanup and disposal activities conducted by Alabama Power Company.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon C. Trippany".

Sharon C. Trippany, CHMM



10/21/2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include ALLETE, Inc. d.b.a. Minnesota Power on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

ALLETE, Inc. d.b.a. Minnesota Power, headquartered at 30 West Superior Street, Duluth, MN 55802 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include ALLETE, Inc. d.b.a. Minnesota Power on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, ALLETE, Inc. d.b.a. Minnesota Power would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure ALLETE, Inc. d.b.a. Minnesota Power locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite ALLETE, Inc. d.b.a. Minnesota Power cleanup activities while remaining protective of the environment.

You may contact Ross Dudzik (Environmental Compliance Specialist, rdudzik@mnpower.com) for information regarding this application and PCB spill cleanup and disposal activities conducted by ALLETE, Inc. d.b.a. Minnesota Power.

Thank you for your attention to this matter.

Sincerely,

Ross Dudzik
Environmental Compliance Specialist



October 24, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Ameren Illinois on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Ameren Illinois, headquartered at 6 Executive Drive, Collinsville, Illinois, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Ameren Illinois on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Ameren Illinois would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Ameren Illinois locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Ameren Illinois cleanup activities while remaining protective of the environment.

You may contact me at jspalding@ameren.com and/or 314-554-2210 for information regarding this application and PCB spill cleanup and disposal activities conducted by Ameren Illinois.

Thank you for your attention to this matter.

Sincerely,



Jennifer K. Spalding
Consulting Environmental Scientist



October 28, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Ameren Missouri on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Ameren Missouri headquartered at 1901 Chouteau Avenue, St. Louis, MO and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Ameren Missouri on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Ameren Missouri would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Ameren Missouri locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Ameren Missouri cleanup activities while remaining protective of the environment.

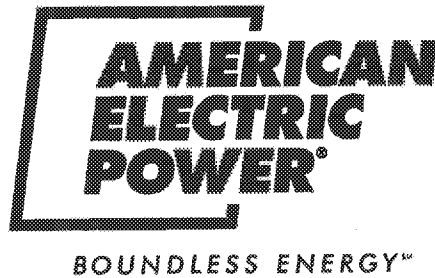
You may contact Barbara Miller, Consulting Environmental Scientist, 314-554-2194 for information regarding this application and PCB spill cleanup and disposal activities conducted by Ameren Missouri.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Giesmann".

Craig Giesmann, P.E., P.H.P.
Sr. Manager Environmental Services



October 14, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include American Electric Power Company on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

American Electric Power Company, headquartered at 1 Riverside Plaza, Columbus, Ohio 43215 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include American Electric Power Company on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, American Electric Power Company would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure American Electric Power Company locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite American Electric Power Company's cleanup activities while remaining protective of the environment.

You may contact Daniel E. Mains, P.E., Environmental Engineer Senior at demains@aep.com and/or 614-716-3374 for information regarding this application and PCB spill cleanup and disposal activities conducted by American Electric Power Company.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "David A. Miller".

David A. Miller, P.E.
Director of Land Environment & Remediation Services



American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

October 17, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include American Transmission Systems, Inc. on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

American Transmission Systems, Inc., headquartered at 76 South Main St., Akron, OH, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include American Transmission Systems, Inc. on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, American Transmission Systems, Inc. would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure American Transmission Systems, Inc. locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite American Transmission Systems, Inc.'s cleanup activities while remaining protective of the environment.

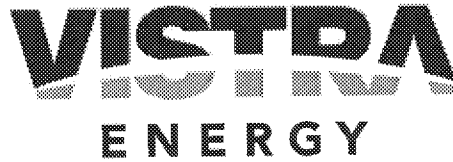
You may contact Guy Gockley, Consulting Engineer, 610-921-6920 for information regarding this application and PCB spill cleanup and disposal activities conducted by American Transmission Systems, Inc..

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "D Hoone", is written over the typed name.

David Hoone
Supervisor, CCR and Waste Programs
FirstEnergy



CYNTHIA E. VODOPIVEC
VP Environmental Health & Safety
o 214.812.2050

October 25, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to list ANP Bellingham Energy Company, LLC, a Subsidiary of Vistra Energy Corp., on
USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Vistra Energy Corp., headquartered at 6555 Sierra Drive, Irving, TX 75039 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests on behalf of ANP Bellingham Energy Company, LLC, a subsidiary of Vistra Energy Corp., headquartered in Irving, TX, that EPA include on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, ANP Bellingham Energy Company, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure ANP Bellingham Energy Company, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite ANP Bellingham Energy Company, LLC's cleanup activities while remaining protective of the environment.

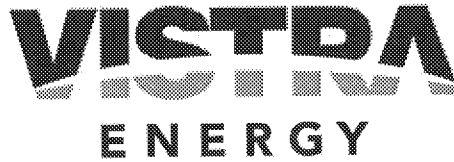
You may contact Vincent Dodge, Director Environmental, at vincent.dodge@vistraenergy.com or 315-349-5109 for information regarding PCB spill cleanup and disposal activities conducted by ANP Bellingham Energy Company, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia E. Vodopivec".

Cynthia E. Vodopivec



CYNTHIA E. VODOPIVEC
VP Environmental Health & Safety
o 214.812.2050

October 25, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to list ANP Blackstone Energy Company, LLC, a Subsidiary of Vistra Energy Corp., on
USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Vistra Energy Corp., headquartered at 6555 Sierra Drive, Irving, TX 75039 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests on behalf of ANP Blackstone Energy Company, LLC, a subsidiary of Vistra Energy Corp., headquartered in Irving, TX, that EPA include on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, ANP Blackstone Energy Company, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure ANP Blackstone Energy Company, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite ANP Blackstone Energy Company, LLC's cleanup activities while remaining protective of the environment.

You may contact Vincent Dodge, Director Environmental, at vincent.dodge@vistraenergy.com or 315-349-5109 for information regarding PCB spill cleanup and disposal activities conducted by ANP Blackstone Energy Company, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cynthia E. Vodopivec".

Cynthia E. Vodopivec



October 14, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Appalachian Power Company on USWAG PCB Remediation
Waste Disposal Approvals

Dear Mr. Johnson:

Appalachian Power Company, headquartered at 500 Lee Street East, Suite 800, Laidley Tower, Charleston, WV 25301 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Appalachian Power Company on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Appalachian Power Company would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Appalachian Power Company locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Appalachian Power Company's cleanup activities while remaining protective of the environment.

You may contact Daniel E. Mains, P.E., Environmental Engineer Senior at demains@aep.com and/or 614-716-3374 for information regarding this application and PCB spill cleanup and disposal activities conducted by Appalachian Power Company.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "David A. Miller".

David A. Miller, P.E.
Director of Land Environment & Remediation Services



October 18, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

**RE: REQUEST TO INCLUDE ARIZONA ELECTRIC POWER COOPERATIVE,
INC. ON USWAG PCB REMEDIATION WASTE DISPOSAL APPROVALS**

Dear Mr. Johnson:

Arizona Electric Power Cooperative, Inc. (AEPCO), headquartered at 1000 S. Highway 80, Benson, Arizona 85602 and a member of the Utility Solid Waste Activities Group (USWAG), hereby requests that the Environmental Protection Agency (EPA) include AEPCO on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the Approval). If approved by EPA, AEPCO would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AEPCO locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AEPCO's cleanup activities while remaining protective of the environment.

You may contact Ms. Erin Broussard, Environmental Specialist, ebroussard@azgt.coop, at (520) 586-5491 for information regarding this application and PCB spill cleanup and disposal activities conducted by AEPCO.

Thank you for your attention to this matter.

Sincerely,

Michelle R. Freeark
Executive Director of Regulatory Affairs & Corporate Services



ERIC MASSEY
Director
Corporate Environmental
PO Box 53999
Phoenix, Arizona 85072-3999
Mail Station 9303
Tel. 602.250.4774
Eric.Massey@aps.com

October 3, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Arizona Public Service Company on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Arizona Public Service Company ("APS"), headquartered at 400 N. 5th Street, Phoenix, AZ and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include APS on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, APS would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure APS locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite APS's cleanup activities while remaining protective of the environment.

You may contact Neal Brown, Environmental Field Operations Manager (Neal.Brown@aps.com, 602-250-2414) for information regarding PCB spill cleanup and disposal activities conducted by APS.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Massey", is written over a circular dotted line.

Eric Massey
Director
APS, Corporate Environmental



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Arthur Kill Power LLC on USWAG PCB Remediation
Waste Disposal Approvals

Dear Mr. Johnson:

NRG Energy, Inc. a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Arthur Kill Power LLC located in Staten Island, New York on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Arthur Kill Power LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Arthur Kill Power LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Arthur Kill Power LLC cleanup activities while remaining protective of the environment.

You may contact David Bacher, Senior Regional Manager, at david.bacher@nrg.com and/or (302) 540-0327 for information regarding this application and PCB spill cleanup and disposal activities conducted.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John McKenna", is written over the typed name and title.

John McKenna
Plant Manager

October 14, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Associated Electric Cooperative, Inc. on USWAG PCB Remediation Waste Disposal Approvals

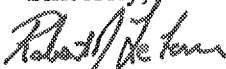
Dear Mr. Johnson:

Associated Electric Cooperative Inc. (AECI), headquartered at 2814 South Golden Ave. Springfield, MO 65801 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include AECI on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, AECI would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure AECI locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite AECI's cleanup activities while remaining protective of the environment.

You may contact Rob LeForce, Environmental Analyst at rleforce@aeci.org or by phone at (417) 371-5653 for information regarding this application and PCB spill cleanup and disposal activities conducted by AECI.

Thank you for your attention to this matter.

Sincerely,



Rob LeForce
Environmental Analyst



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Astoria Gas Turbine Power LLC on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

NRG Energy, Inc. a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Astoria Gas Turbine Power LLC located in Astoria, New York on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Astoria Gas Turbine Power LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Astoria Gas Turbine Power LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Astoria Gas Turbine Power LLC cleanup activities while remaining protective of the environment.

You may contact David Bacher, Senior Regional Manager, at david.bacher@nrg.com and/or (302) 540-0327 for information regarding this application and PCB spill cleanup and disposal activities conducted.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Scano".

Andrew Scano
Plant Manager

Atlantic City Electric
5100 Harding Highway
Mays Landing NJ 08330
800 642 3780

atlanticcityelectric.com

October 14, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Atlantic City Electric on USWAG PCB Remediation
Waste Disposal Approvals

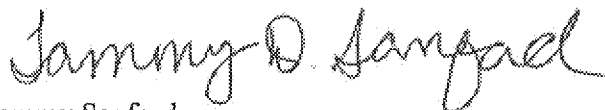
Dear Mr. Johnson:

Atlantic City Electric, headquartered at 5100 Harding Highway, Mays Landing, NJ, 08330-2239 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Atlantic City Electric on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Atlantic City Electric would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Atlantic City Electric locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Atlantic City Electric's cleanup activities while remaining protective of the environment.

You may contact Charles May, Sr Environmental Program Manager via phone at 302-429-3542 or via email at charles.may@pepcoholdings.com for information regarding this application and PCB spill cleanup and disposal activities conducted by Atlantic City Electric.

Thank you for your attention to this matter.

Sincerely,



Tammy Sanford
Manager, Environmental Management

October 21, 2019



Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Baltimore Gas and Electric Company on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Baltimore Gas and Electric Company, headquartered at 2 Center Plaza, 110 W. Fayette St., Baltimore, MD 21201 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Baltimore Gas and Electric Company on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Baltimore Gas and Electric Company would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Baltimore Gas and Electric Company locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Baltimore Gas and Electric Company's cleanup activities while remaining protective of the environment.

If you have any questions or need additional information, please contact me directly at 410-470-6433 or keith.s.wesselman@bge.com for information regarding this application and PCB spill cleanup and disposal activities conducted by Baltimore Gas and Electric Company. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Wesselman", followed by a horizontal line.

Keith Wesselman
Principal Environmental Project Mgr.
Environmental Management Unit
Baltimore Gas and Electric Co.

cc: Damon Krieger (BGE)
Dominic Imbrgia (BGE)
David Tomlinson (Exelon)



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Barney Davis, LLC, a subsidiary of Talen Energy on USWAG
PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Barney Davis, LLC, located at 4301 Waldron Rd, Corpus Christi, TX 78418 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Barney Davis, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Barney Davis, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Barney Davis, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Barney Davis, LLC's cleanup activities while remaining protective of the environment.

You may contact Craig Shamory, Environmental Policy & Strategy Manager, craig.shamory@talenenergy.com, 610-601-0505 for information regarding this application and PCB spill cleanup and disposal activities conducted by Barney Davis, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Weissinger", written in a cursive style.

Thomas Weissinger
Sr. Director, Environmental Affairs
Talen Energy



WEC Energy Group, Inc.
231 W. Michigan St.
Milwaukee, WI 53203

10/18/19

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Bluewater Natural Gas Holding, LLC, a subsidiary of WEC Energy Group, Inc., on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Bluewater Natural Gas Holding, LLC, a subsidiary of WEC Energy Group, Inc., headquartered at 333 S. Wales Center Rd Columbus, MI 48063 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Bluewater Natural Gas Holding, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Bluewater Natural Gas Holding, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Bluewater Natural Gas Holding, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Bluewater Natural Gas Holding, LLC cleanup activities while remaining protective of the environment.

You may contact Stephanie Berti, Manager—Waste Recycling & Disposal, Stephanie.Berti@wecenergygroup.com and/or 414-221-4045 for information regarding this application and PCB spill cleanup and disposal activities conducted by Bluewater Natural Gas Holding, LLC.

Thank you for your attention to this matter.

Sincerely,

Stephanie Berti

Stephanie Berti, P.G.

Manager — Waste, Recycling & Disposal

Charles Willard
Director, Environmental Management



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include the Boston Gas Company, an Operating Company of National Grid, on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

The Boston Gas Company (BGC), headquartered at 40 Sylvan Road, Waltham, Massachusetts, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include BGC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, BGC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure BGC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite BGC's cleanup activities while remaining protective of the environment.

You may contact Peter Harley, Environmental Manager, at 781-907-3701 or peter.harley@nationalgrid.com for information regarding this application and PCB spill cleanup and disposal activities conducted by BGC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Willard", written over a horizontal line.

Charles Willard
Director, Environmental Management



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Brandon Shores, LLC, a subsidiary of Talen Energy on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Brandon Shores, LLC, located at 1005 Brandon Shores Rd, Curtis Bay, MD 21226 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Brandon Shores, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Brandon Shores, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Brandon Shores, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Brandon Shores, LLC's cleanup activities while remaining protective of the environment.

You may contact Craig Shamory, Environmental Policy & Strategy Manager, craig.shamory@talenenergy.com, 610-601-0505 for information regarding this application and PCB spill cleanup and disposal activities conducted Brandon Shores, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Weissinger", with a long, sweeping horizontal line extending to the right.

Thomas Weissinger
Sr. Director, Environmental Affairs
Talen Energy

Charles Willard
Director, Environmental Management



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include the Brooklyn Union Gas Company, an Operating Company of
National Grid, on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

The Brooklyn Union Gas Company (BUG), headquartered at 175 E. Old Country Road, Hicksville, New York, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include BUG on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, BUG would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure BUG locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite BUG's cleanup activities while remaining protective of the environment.

You may contact Christopher Corrado, Environmental Manager, at 516-545-2556 or christopher.corrado@nationalgrid.com for information regarding this application and PCB spill cleanup and disposal activities conducted by BUG.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles Willard", written over a horizontal line.

Charles Willard
Director, Environmental Management



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Brunner Island, LLC, a subsidiary of Talen Energy on
USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Brunner Island, LLC, located at 1400 Wago Rd, York Haven, PA 17370 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Brunner Island, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Brunner Island, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Brunner Island, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Brunner Island, LLC's cleanup activities while remaining protective of the environment.

You may contact Craig Shamory, Environmental Policy & Strategy Manager, craig.shamory@talenenergy.com, 610-601-0505 for information regarding this application and PCB spill cleanup and disposal activities conducted by Brunner Island, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Weissinger", with a stylized flourish at the end.

Thomas Weissinger
Sr. Director, Environmental Affairs
Talen Energy



Cabrillo Power I LLC
4600 Carlsbad Boulevard
Carlsbad, CA 92008
Phone: 760-268-4000
Fax: 760-268-4026

October 24, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Cabrillo Power I LLC on USWAG PCB Remediation
Waste Disposal Approvals

Dear Mr. Johnson:

NRG Energy, Inc. a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Cabrillo Power I LLC located in Carlsbad, California on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Cabrillo Power I LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Cabrillo Power I LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Cabrillo Power I LLC cleanup activities while remaining protective of the environment.

You may contact George Piantka, Senior Director, at George.Piantka@nrg.com and/or (760) 930-1505 for information regarding this application and PCB spill cleanup and disposal activities conducted.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jerry L. Carter".

Jerry L. Carter
Plant Manager
Cabrillo Power I LLC



CYNTHIA E. VODOPIVEC
VP Environmental Health & Safety
o 214.812.2050

October 25, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to list Calumet Energy Team, LLC, a Subsidiary of Vistra Energy Corp., on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Vistra Energy Corp., headquartered at 6555 Sierra Drive, Irving, TX 75039 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests on behalf of Calumet Energy Team, LLC, a subsidiary of Vistra Energy Corp., headquartered in Irving, TX, that EPA include on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Calumet Energy Team, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Calumet Energy Team, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Calumet Energy Team, LLC's cleanup activities while remaining protective of the environment.

You may contact Phil Morris, Sr. Director Environmental Services, at phil.morris@vistraenergy.com or 618-343-7794 for information regarding PCB spill cleanup and disposal activities conducted by Calumet Energy Team, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia E. Vodopivec".

Cynthia E. Vodopivec



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Camden Plant Holding, LLC, a subsidiary of Talen Energy on
USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Camden Plant Holding, LLC, located at 570 Chelton Ave, Camden, NJ 08104 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Camden Plant Holding, LLC on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Camden Plant Holding, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Camden Plant Holding, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Camden Plant Holding, LLC's cleanup activities while remaining protective of the environment.

You may contact Craig Shamory, Environmental Policy & Strategy Manager, craig.shamory@talenenergy.com, 610-601-0505 for information regarding this application and PCB spill cleanup and disposal activities conducted Camden Plant Holding, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Weissinger", with a long, sweeping horizontal line extending to the right.

Thomas Weissinger
Sr. Director, Environmental Affairs
Talen Energy



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803
www.cngc.com

October 15, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Cascade Natural Gas Corporation, a Subsidiary of MDU Resources Group, Inc., on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

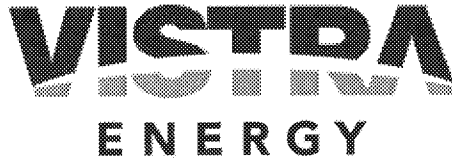
Cascade Natural Gas Corporation (Cascade), a Subsidiary of MDU Resources Group, Inc., headquartered at 8113 W. Grandridge Blvd., Kennewick, WA 99336, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Cascade on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Cascade would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Cascade locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Cascade's cleanup activities while remaining protective of the environment.

You may contact Andy McDonald, Environmental Scientist, at andy.mcdonald@mdu.com or 701-222-7941, for information regarding this application and PCB spill cleanup and disposal activities conducted by Cascade.

Thank you for your attention to this matter.

Sincerely,

Abbie Krebsbach
Environmental Director



CYNTHIA E. VODOPIVEC
VP Environmental Health & Safety
o 214.812.2050

October 25, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to list Casco Bay Energy Company, LLC, a Subsidiary of Vistra Energy Corp., on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Vistra Energy Corp., headquartered at 6555 Sierra Drive, Irving, TX 75039 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests on behalf of Casco Bay Energy Company, LLC, a subsidiary of Vistra Energy Corp., headquartered in Irving, TX, that EPA include on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Casco Bay Energy Company, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Casco Bay Energy Company, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Casco Bay Energy Company, LLC's cleanup activities while remaining protective of the environment.

You may contact Vincent Dodge, Director Environmental, at vincent.dodge@vistraenergy.com or 315-349-5109 for information regarding PCB spill cleanup and disposal activities conducted by Casco Bay Energy Company, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cynthia E. Vodopivec".

Cynthia E. Vodopivec



CenterPoint Energy
P.O. Box 1700
Houston, TX 77251-1700

October 23, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include CenterPoint Energy Houston Electric, LLC, a subsidiary of
CenterPoint Energy, Inc. on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

CenterPoint Energy Houston Electric, LLC (CEHE), a subsidiary of CenterPoint Energy, Inc., headquartered at 1111 Louisiana St., Houston, Texas 77002 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include CEHE on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, CEHE would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure CEHE locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite CEHE cleanup activities while remaining protective of the environment.

You may contact Douglas Harris, Environmental Manager, by phone at 713-945-6624 or by email at douglas.harris@centerpointenergy.com for information regarding this application and PCB spill cleanup and disposal activities conducted by CEHE.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott Duhon".

Scott Duhon, P. G.
Director Environmental Compliance and Policy
CenterPoint Energy, Inc.



October 1, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include CenterPoint Energy, Inc. on USWAG PCB Remediation
Waste Disposal Approvals

Dear Mr. Johnson:

CenterPoint Energy, Inc., headquartered at 1111 Louisiana St., Houston, Texas 77002 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include CenterPoint Energy, Inc. on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, CenterPoint Energy, Inc. would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure CenterPoint Energy, Inc. locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite CenterPoint Energy, Inc. cleanup activities while remaining protective of the environment.

You may contact Douglas Harris, Environmental Manager, by phone at 713-945-6624 or by email at douglas.harris@centerpointenergy.com for information regarding this application and PCB spill cleanup and disposal activities conducted by CenterPoint Energy, Inc.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott Duhon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott Duhon, P. G.
Director Environmental Compliance and Policy
CenterPoint Energy, Inc.



October 4, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Central Hudson Gas and Electric Corporation on USWAG
PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Central Hudson Gas and Electric Corporation, headquartered at 284 South Avenue, Poughkeepsie, New York 12601 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Central Hudson Gas and Electric Corporation on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Central Hudson Gas and Electric Corporation would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Central Hudson Gas and Electric Corporation locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Central Hudson Gas and Electric Corporation's cleanup activities while remaining protective of the environment.

You may contact Karen Lo, Environmental Coordinator, KLo@cenhud.com and/or 845-486-5691 for information regarding this application and PCB spill cleanup and disposal activities conducted by Central Hudson Gas and Electric Corporation.

Thank you for your attention to this matter.

Sincerely,

Karen Rebecca Lo
Environmental Coordinator



Cleco Cajun LLC

A subsidiary of Cleco Corporate Holdings LLC
112 Telly Street
New Roads, LA 70760
www.cleco.com

September 30, 2019

Mr. Barnes Johnson
Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

RE: Request to include Cleco Cajun LLC on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Cleco Cajun LLC, a subsidiary of Cleco Corporate Holdings LLC (Cleco Cajun), headquartered at 112 Telly Street, New Roads, LA, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Cleco Cajun on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Cleco Cajun would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Cleco Cajun locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Cleco Cajun's cleanup activities while remaining protective of the environment.

You may contact me for information regarding PCB spill cleanup and disposal activities conducted by Cleco Cajun LLC.

Thank you for your attention to this matter.

Respectfully,

Michael Martin
Sr. Environmental Specialist
Office: (318) 484-7641
Mobile: (318) 308-1201
michael.martin@cleco.com



Cleco Power LLC
A Subsidiary of Cleco Corporate Holdings LLC
2030 Donahue Ferry Rd
P. O. Box 5000
Pineville, LA 71361-5000

September 30, 2019

Mr. Barnes Johnson
Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

RE: Request to include Cleco Power LLC on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Cleco Power LLC, a subsidiary of Cleco Corporate Holdings LLC ("Cleco Power"), headquartered at 2030 Donahue Ferry Road, Pineville, LA, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Cleco Power on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Cleco would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Cleco Power locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Cleco Power's cleanup activities while remaining protective of the environment.

You may contact me for information regarding PCB spill cleanup and disposal activities conducted by Cleco Power LLC.

Thank you for your attention to this matter.

Respectfully,

A handwritten signature in dark ink, appearing to read "Michael Martin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Martin
Sr. Environmental Specialist
Office: (318) 484-7641
Mobile: (318) 308-1201
michael.martin@cleco.com



October 30, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to List Clinton LFGTE Facility, an Operating Company of Wabash Valley Power Alliance, on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Wabash Valley Power Alliance, headquartered at 6702 Intech Boulevard in Indianapolis Indiana and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests on behalf of Clinton LFGTE Facility that EPA include Clinton LFGTE Facility (located at 9560 Heritage Road, Clinton, Illinois), an Operating Company of Wabash Valley Power Alliance, on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Clinton LFGTE Facility would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Clinton LFGTE Facility locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Clinton LFGTE Facility cleanup activities while remaining protective of the environment.

You may contact S. Dear Schramm-Satayathum, Manager of Environmental Affairs (d_schramm@wvpa.com; 317-481-2868) for information regarding this application and PCB spill cleanup and disposal activities conducted by Clinton LFGTE Facility.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Dear Schramm-Satayathum", with a long horizontal flourish extending to the right.

S. Dear Schramm-Satayathum
Manager, WVPA Environmental Affairs



CYNTHIA E. VODOPIVEC
VP Environmental Health & Safety
o 214.812.2050

October 25, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to list Coletto Creek Power, LLC, a Subsidiary of Vistra Energy Corp., on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Vistra Energy Corp., headquartered at 6555 Sierra Drive, Irving, TX 75039 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests on behalf of Coletto Creek Power, LLC, a subsidiary of Vistra Energy Corp., headquartered in Irving, TX, that EPA include on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Coletto Creek Power, LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Coletto Creek Power, LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Coletto Creek Power, LLC's cleanup activities while remaining protective of the environment.

You may contact Kim Mireles, Sr. Director Environmental Services, at kimberly.mireles@luminant.com or 214-875-8382 for information regarding PCB spill cleanup and disposal activities conducted by Coletto Creek Power, LLC.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cynthia E. Vodopivec".

Cynthia E. Vodopivec

Charles Willard
Director, Environmental Management



October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include the Colonial Gas Company, an Operating Company of
National Grid, on USWAG PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

The Colonial Gas Company (Colonial), headquartered at 40 Sylvan Road, Waltham, Massachusetts, and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Colonial on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Colonial would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Colonial locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Colonial's cleanup activities while remaining protective of the environment.

You may contact Peter Harley, Environmental Manager, at 781-907-3701 or peter.harley@nationalgrid.com for information regarding this application and PCB spill cleanup and disposal activities conducted by Colonial.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles Willard", written over a horizontal line.

Charles Willard
Director, Environmental Management

October 7, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Columbia Gas of Kentucky on USWAG PCB Remediation
Waste Disposal Approvals

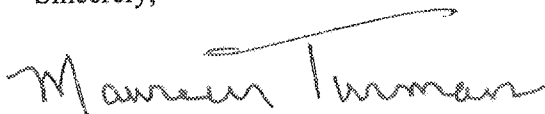
Dear Mr. Johnson:

Columbia Gas of Kentucky, headquartered at 2001 Mercer Road, Lexington, KY, 40511 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Columbia Gas of Kentucky on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Columbia Gas of Kentucky would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Columbia Gas of Kentucky locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Columbia Gas of Kentucky cleanup activities while remaining protective of the environment.

You may contact Maureen Turman, Director of Environmental Policy and Sustainability, at mturman@nisource.com and/or (219) 647-4887 for information regarding this application and PCB spill cleanup and disposal activities conducted by Columbia Gas of Kentucky.

Thank you for your attention to this matter.

Sincerely,



Maureen Turman
Director Environmental Policy and Sustainability

October 7, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Columbia Gas of Maryland on USWAG PCB Remediation
Waste Disposal Approvals

Dear Mr. Johnson:

Columbia Gas of Maryland, headquartered at 55 Sycamore Street, Hagerstown, MD, 21740 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Columbia Gas of Maryland on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Columbia Gas of Maryland would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Columbia Gas of Maryland locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Columbia Gas of Maryland cleanup activities while remaining protective of the environment.

You may contact Maureen Turman, Director of Environmental Policy and Sustainability, mturman@nsource.com and/or 219-647-4887 for information regarding this application and PCB spill cleanup and disposal activities conducted by Columbia Gas of Maryland.

Thank you for your attention to this matter.

Sincerely,



Maureen Turman
Director of Environmental Policy and Sustainability

October 7, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Columbia Gas of Massachusetts on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Columbia Gas of Massachusetts, headquartered at 4 Technology Drive, Westborough, MA, 01581 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Columbia Gas of Massachusetts on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Columbia Gas of Massachusetts would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Columbia Gas of Massachusetts locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Columbia Gas of Massachusetts cleanup activities while remaining protective of the environment.

You may contact Maureen Turman, Director of Environmental Policy and Sustainability, mturman@nisource.com and/or (219) 647-4887 for information regarding this application and PCB spill cleanup and disposal activities conducted by Columbia Gas of Massachusetts.

Thank you for your attention to this matter.

Sincerely,



Maureen Turman
Director of Environmental Policy and Sustainability

October 7, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Columbia Gas of Ohio on USWAG PCB Remediation Waste
Disposal Approvals

Dear Mr. Johnson:

Columbia Gas of Ohio, headquartered at 290 W Nationwide Blvd, Columbus, OH, 43215 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Columbia Gas of Ohio on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Columbia Gas of Ohio would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Columbia Gas of Ohio locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Columbia Gas of Ohio cleanup activities while remaining protective of the environment.

You may contact Maureen Turman, Director of Environmental Policy and Sustainability, mturman@nisource.com and/or (219) 647-4887 for information regarding this application and PCB spill cleanup and disposal activities conducted by Columbia Gas of Ohio.

Thank you for your attention to this matter.

Sincerely,



Maureen Turman
Director of Environmental Policy and Sustainability

October 7, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Columbia Gas of Pennsylvania on USWAG PCB Remediation
Waste Disposal Approvals

Dear Mr. Johnson:

Columbia Gas of Pennsylvania, headquartered at 121 Champion Way, Canonsburg, PA, 15317 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Columbia Gas of Pennsylvania on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Columbia Gas of Pennsylvania would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Columbia Gas of Pennsylvania locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Columbia Gas of Pennsylvania cleanup activities while remaining protective of the environment.

You may contact Maureen Turman, Director of Environmental Policy and Sustainability, mturman@nisource.com and/or (219) 647-4887 for information regarding this application and PCB spill cleanup and disposal activities conducted by Columbia Gas of Pennsylvania.

Thank you for your attention to this matter.

Sincerely,



Maureen Turman
Director of Environmental Policy and Sustainability

October 7, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Columbia Gas of Virginia on USWAG PCB Remediation
Waste Disposal Approvals

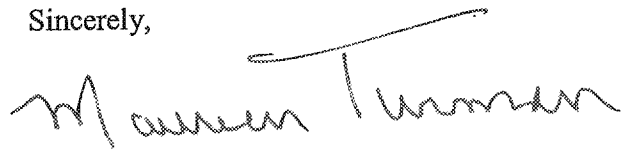
Dear Mr. Johnson:

Columbia Gas of Virginia, headquartered at 1809 Coyote Drive, Chester VA, 23836 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Columbia Gas of Virginia on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Columbia Gas of Virginia would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Columbia Gas of Virginia locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Columbia Gas of Virginia cleanup activities while remaining protective of the environment.

You may contact Maureen Turman, Director of Environmental Policy and Sustainability, mturman@nisource.com and/or (219) 647-4887 for information regarding this application and PCB spill cleanup and disposal activities conducted by Columbia Gas of Virginia.

Thank you for your attention to this matter.

Sincerely,



Maureen Turman
Director of Environmental Policy and Sustainability

Commonwealth Edison Company
Two Lincoln Centre
Oakbrook Terrace, IL 60181 4260



An Exelon Company

October 4th, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Commonwealth Edison Company on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Commonwealth Edison Company, headquartered at Two Lincoln Center, Oakbrook Terrace, IL 60181 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Commonwealth Edison Company on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Commonwealth Edison Company would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Commonwealth Edison Company locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Commonwealth Edison Company's cleanup activities while remaining protective of the environment.

You may contact Kareena Wasserman (Environmental Program Manager, kareena.wasserman@comed.com, 630.576.7114) for information regarding this application and PCB spill cleanup and disposal activities conducted by Commonwealth Edison Company.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Bulthaup". The signature is fluid and cursive, with a large "T" and "B".

Timothy Bulthaup
Manager, Environmental Management



Connecticut Jet Power LLC
734 Naugatuck Avenue
Milford, CT, 06461

An NRG Energy Company

October 21, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Connecticut Jet Power LLC on USWAG PCB
Remediation Waste Disposal Approvals

Dear Mr. Johnson:

NRG Energy, Inc. a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Connecticut Jet Power LLC located in Milford, Connecticut on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Connecticut Jet Power LLC would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Connecticut Jet Power LLC locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Connecticut Jet Power LLC cleanup activities while remaining protective of the environment.

You may contact David Bacher, Senior Regional Manager, at david.bacher@nrg.com and/or (302) 540-0327 for information regarding this application and PCB spill cleanup and disposal activities conducted.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Volturno", written over the word "Sincerely,".

Nicholas Volturno
Plant Manager



Consolidated Edison Company
of New York, Inc.
4 Irving Place
New York, NY 10003
www.conEd.com

October 18, 2019

Office of Resource Conservation and Recovery
1200 Pennsylvania Ave. NW (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson
c/o Venable LLP on behalf of the Utility Solid Waste Activities Group

Re: Request to Include Consolidated Edison Company of New York, Inc. on USWAG
PCB Remediation Waste Disposal Approvals

Dear Mr. Johnson:

Consolidated Edison Company of New York, Inc. headquartered at 4 Irving Place, New York, N.Y. 10003 and a member of the Utility Solid Waste Activities Group ("USWAG"), hereby requests that EPA include Consolidated Edison Company of New York, Inc. on the risk-based PCB remediation waste disposal approval initially issued to USWAG members on June 10, 2014 (the "Approval"). If approved by EPA, Consolidated Edison Company of New York, Inc. would be authorized to dispose of certain as-found less than 50 ppm PCB remediation wastes generated at secure Consolidated Edison Company of New York, Inc. locations in non-TSCA landfills, including municipal solid waste landfills, provided the conditions of the Approval are met, consistent with EPA's prior findings that such activity does not present an unreasonable risk to health or the environment. The Approval will help promote and expedite Consolidated Edison Company of New York, Inc. cleanup activities while remaining protective of the environment.

You may contact Eileen Field, Scientist, fielde@coned.com or 917-654-1168 for information regarding this application and PCB spill cleanup and disposal activities conducted by Consolidated Edison Company of New York, Inc.

Thank you for your attention to this matter.

Sincerely,

Eileen Field
Scientist

November 1, 2019

VIA ELECTRONIC AND U.S. MAIL

Office of Resource Conservation and Recovery
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W. (5305P)
Washington, DC 20460
Attn: Mr. Barnes Johnson

**Re: USWAG Member Company Requests for Inclusion on Risk-Based Disposal
Approval for Certain As-Found < 50 ppm PCB Remediation Wastes from
Electric and Natural Gas Utility Operations**

Dear Mr. Johnson:

Enclosed as requested by EPA, please find letters from individual members (including operating companies of members) of the Utility Solid Waste Activities Group (“USWAG”)¹ requesting inclusion on the risk-based disposal approval first issued to USWAG members on June 10, 2014² pursuant to 40 C.F.R. § 761.61(c), authorizing the disposal of certain PCB remediation wastes generated at secure utility assets with as-found concentrations of < 50 ppm PCBs in non-TSCA units, including municipal solid waste landfills (the “Approval”).

Please note the following regarding the enclosed materials:

- Due to the large file size of the original bundled pdf, for the electronic submission of these materials we have broken the letters into six pdf bundles.
- To facilitate EPA’s review of these materials, we have included a summary chart reflecting the individual entities requesting inclusion on the Approval, organized in alphabetical order by entity name.
- The current package includes requests from three entities that have already submitted requests directly to EPA: National Fuels Gas Distribution Company, National Fuels Gas Supply

¹ USWAG, formed in 1978, is an association of over one hundred and thirty electric utilities, power producers, utility operating companies, and utility service companies located throughout the United States, including the Edison Electric Institute (“EEI”), the American Gas Association (“AGA”), the American Public Power Association (“APPA”), and the National Rural Electric Cooperative Association (“NRECA”). Together, USWAG members represent more than 73% of the total electric generating capacity of the United States, and service more than 95% of the nation’s consumers of electricity.

² A substantively identical version of the Approval has been issued to new USWAG members (*i.e.*, those not a member of USWAG, or otherwise not listed in Appendix II to the Approval, at the time of the June 10, 2014 Approval issuance) on April 12, 2016, with an expiration date coinciding with that of the original Approval (*i.e.*, June 10, 2019).

November 1, 2019
Office of Resource Conservation and Recovery
United States Environmental Protection Agency
Page 2 of 2

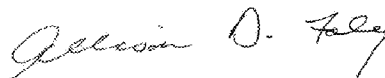
Company, and Otter Tail Power Company. We have included these materials in the current submission so that EPA would have all relevant materials in one place.

- The letter requesting Midwest Generation, LLC be included in the Approval identifies multiple locations in which that entity has operations. For purposes of listing in Appendix II, please note that Midwest Generation, LLC is based in Pekin, Illinois.
- The enclosed materials include a cover letter provided by NRG Energy, Inc. to accompany the operating company-specific request letters making requests on behalf of twenty-one separate NRG operating companies. Because the twenty-one separate requests for these entities are scattered throughout the attached pdf (which is organized alphabetically based on requesting entity name), we have appended the NRG cover letter at the end of the pdf materials.

USWAG understands that, based on the language of Condition 13 of the Approval and in light of USWAG's timely request for renewal submitted to the Agency on March 11, 2019, that the current Approval as originally issued on June 10, 2014 is administratively continued and remains in effect until such time as EPA renews and/or re-issues the Approval. (This understanding has been confirmed by representatives of the Office of Resource Conservation and Recovery.)

We thank EPA for its continued efforts to review and renew this important Approval, which provides significant value not only to USWAG members but also to the general public and the environment by promoting safe, effective, and efficient cleanups. Please contact me (adfoley@venable.com; 202-344-4416) with questions regarding today's submission, or for company-specific questions please feel free to contact the appropriate contact person identified in the relevant company-specific request letter.

Sincerely,



Allison D. Foley
Venable LLP
Counsel to the Utility Solid Waste Activities Group

Attachments

Cc: K. Swetland-Johnson (ORCR)
J. Roewer (USWAG)

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

<u>Company Name</u>	<u>City</u>	<u>State</u>	<u>PCB Contact</u>	<u>Title</u>	<u>Email</u>	<u>Phone</u>
AEP Ohio	Gahanna	Ohio	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
AEP Texas	Corpus Christi	Texas	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
AES Alamos, LLC	Long Beach	California	Jose Perez; Jim Beach	Operations Manager; Maintenance Manager	jose.perez@aes.com ; jim.beach@aes.com	
AES Huntington Beach, LLC	Huntington Beach	California	Jose Perez; Jim Beach	Operations Manager; Maintenance Manager	jose.perez@aes.com ; jim.beach@aes.com	
AES Ohio Generation, LLC	Dayton	Ohio	Daniel W. Sweeney	Director, Site Liability Management	dan.sweeney@aes.com	937-259-7716
AES Redondo Beach, LLC	Redondo Beach	California	Jose Perez; Jim Beach	Operations Manager; Maintenance Manager	jose.perez@aes.com ; jim.beach@aes.com	
Alabama Power Company	Birmingham	Alabama	Sharon Trippany	Environmental Affairs Specialist	strippa@southernco.com	205-257-4462
Allete, Inc., d.b.a, Minnesota Power	Duluth	Minnesota	Ross Dudzik	Environmental Compliance Specialist	rdudzik@mnpower.com	
Ameren Illinois	Collinsville	Illinois	Jennifer K. Spalding	Consulting Environmental Scientist	jspalding@ameren.com	314-554-2210
Ameren Missouri	St. Louis	Missouri	Barbara Miller	Consulting Environmental Scientist		314-554-2194
American Electric Power Company	Columbus	Ohio	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
American Transmission Systems Inc.	Akron	Ohio	Guy Gockley	Consulting Engineer		610-921-6920
ANP Bellingham Energy Company, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
ANP Blackstone Energy Company, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Appalachian Power Company	Charleston	West Virginia	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Arizona Electric Power Cooperative, Inc.	Benson	Arizona	Ms. Erin Broussard	Environmental Specialist	ebroussard@azgt.coop	520-586-5491
Arizona Public Service Company	Phoenix	Arizona	Neal Brown	Environmental Field Operations Manager	neal.brown@aps.com	602-250-2414
Arthur Kill Power LLC	Staten Island	New York	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Associated Electric Cooperative, Inc.	Springfield	Missouri	Rob LeForce	Environmental Analyst	rlforce@aeci.org	417-371-5653
Astoria Gas Turbine Power LLC	Astoria	New York	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Atlantic City Electric	Mays Landing	New Jersey	Charles May	Sr. Environmental Program Manager	charles.may@pepcoholdings.com	302-429-3542

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

<u>Company Name</u>	<u>City</u>	<u>State</u>	<u>PCB Contact</u>	<u>Title</u>	<u>Email</u>	<u>Phone</u>
Baltimore Gas and Electric Company	Baltimore	Maryland	Keith Wesselman	Principal Environmental Project Mgr., Environmental Management Unit	keith.s.wesselman@bge.com	410-470-6433
Barney Davis, LLC	Corpus Christi	Texas	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Bluewater Natural Gas Holding, LLC	Columbus	Michigan	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berth@wecenergygroup.com	414-221-4045
Boston Gas Company	Waltham	Massachusetts	Peter Harley	Environmental Manager	peter.harley@nationalgrid.com	781-907-3701
Brandon Shores, LLC	Curtis Bay	Maryland	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Brooklyn Union Gas Company	Hicksville	New York	Chrisopher Corrado	Environmental Manager	christopher.corrado@nationalgrid.com	516-545-2556
Brunner Island, LLC	York Haven	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Cabrillo Power I LLC	Carlsbad	California	George Piantka	Senior Director	george.piantka@nrg.com	760-930-1505
Calumet Energy Team, LLC	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Camden Plant Holding, LLC	Camden	New Jersey	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Cascade Natural Gas Corporation	Kennewick	Washington	Andy McDonald	Environmental Scientist	andy.mcdonald@mdu.com	701-222-7941
Casco Bay Energy Company, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
CenterPoint Energy Houston Electric, LLC	Houston	Texas	Douglas Harris	Environmental Manager	douglas.harris@centerpointenergy.com	713-945-6624
CenterPoint Energy, Inc.	Houston	Texas	Douglas Harris	Environmental Manager	douglas.harris@centerpointenergy.com	713-945-6624
Central Hudson Gas and Electric Corporation	Poughkeepsie	New York	Karen Lo	Environmental Coordinator	klo@cenhud.com	845-486-5691
Cleco Cajun LLC	New Roads	Louisiana	Michael Martin	Senior Environmental Specialist	michael.martin@cleco.com	318-484-7641 318-308-1201
Cleco Power LLC	Pineville	Louisiana	Michael Martin	Senior Environmental Specialist	michael.martin@cleco.com	318-484-7641 318-308-1201
Clinton LFGTE Facility	Clinton	Illinois	S. Dear Schramm-Satayathum	Manager of Environmental Affairs	d_schramm@wvpa.com	317-481-2868
Coletto Creek Power, LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Colonial Gas Company	Waltham	Massachusetts	Peter Harley	Environmental Manager	peter.harley@nationalgrid.com	781-907-3701
Columbia Gas of Kentucky	Lexington	Kentucky	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
Columbia Gas of Maryland	Hagerstown	Maryland	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

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Columbia Gas of Massachusetts	Westborough	Massachusetts	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
Columbia Gas of Ohio	Columbus	Ohio	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
Columbia Gas of Pennsylvania	Canonsburg	Pennsylvania	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
Columbia Gas of Virginia	Chester	Virginia	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
Commonwealth Edison Company	Oakbrook Terrace	Illinois	Kareena Wasserman	Environmental Program Manager	kareena.wasserman@comed.com	630-576-7114
Connecticut Jet Power, LLC	Milford	Connecticut	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Consolidated Edison Company of New York, Inc.	New York	New York	Eileen Field	Scientist	fielde@coned.com	917-654-1168
Consumers Energy	Jackson	Michigan	Michael Moler	Senior Environmental Analyst	michael.moler@cmsenergy.com	517-788-1472
Dairyland Power Cooperative	La Crosse	Wisconsin	Tad Schwartzhoff	Senior Analytical Chemist	tad.schwartzhoff@dairylandpower.com	608-787-1441
Dartmouth Power Associates, LP	Dartmouth	Massachusetts	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenergy.com	610-601-0505
Delmarva Power	Newark	Delaware	Charles May	Sr. Environmental Program Manager	charles.may@pepcoholdings.com	302-429-3542
Devon Power, LLC	Milford	Connecticut	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Dominion Energy Carolina Gas Transmission, LLC	Columbia	South Carolina	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Energy Cove Point LNG, LP	Richmond	Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Energy Field Services, Inc.	Richmond	Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Energy Overthrust Pipeline, LLC	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Energy Questar Pipeline, LLC	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Energy South Carolina	Cayce	South Carolina	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Energy Transmission, Inc	Bridgeport	West Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Privatization Texas, LLC	Richmond	Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Dominion Privatization Virginia, LLC	Richmond	Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988

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DTE Electric Company	Detroit	Michigan	Diane Martino	Environmental Management & Resources	diane.martino@dteenergy.com	313-235-6206
DTE Energy Company	Detroit	Michigan	Diane Martino	Environmental Management & Resources	diane.martino@dteenergy.com	313-235-6206
DTE Gas Company	Detroit	Michigan	Diane Martino	Environmental Management & Resources	diane.martino@dteenergy.com	313-235-6206
Duke Energy Carolinas, LLC	Cincinnati	Ohio	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Corporation	Charlotte	North Carolina	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Florida, LLC	St. Petersburg	Florida	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Indiana, LLC	Plainfield	Indiana	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Kentucky, Inc.	Cincinnati	Ohio	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Ohio, Inc.	Cincinnati	Ohio	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Progress, LLC	Raleigh	North Carolina	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Duke Energy Renewables, Inc.	Charlotte	North Carolina	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Dunkirk Power LLC	Dunkirk	New York	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Dynegy Dicks Creek, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Fayette II, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Hanging Rock II, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Kendall Energy, LLC	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Dynegy Miami Fort, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Midwest Generation, LLC	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Dynegy Morro Bay, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Moss Landing, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Oakland, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Washington II, LCC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Dynegy Zimmer, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
East Kentucky Power Cooperative	Winchester	Kentucky	Jerry Purvis	Vice President of Environmental Affairs	jerry.purvis@ekpc.coop	859-744-4812

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El Segundo Power, LLC	El Segundo	California	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Electric Energy, Inc.	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Elmwood Park Power, LLC	Elmwood Park	New Jersey	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Ennis Power Company, LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Entergy Arkansas, LLC	Little Rock	Arkansas	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Louisiana, LLC	Jefferson	Louisiana	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Mississippi, LLC	Jackson	Mississippi	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy New Orleans, LLC	New Orleans	Louisiana	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Nuclear Indian Point 2, LLC	Buchanan	New York	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Nuclear Indian Point 3, LLC	Buchanan	New York	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Nuclear Operations, Inc.	Jackson	Mississippi	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Nuclear Palisades, LLC	Covert	Michigan	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Operations, Inc.	Jackson	Mississippi	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Services, LLC	New Orleans	Louisiana	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Entergy Texas, Inc.	The Woodlands	Texas	Jason Bourgeois	Sr. Lead Environmental Analyst	jbou3@entergy.com	504-846-6819
Evergy Kansas Central, Inc	Kansas City	Missouri	Geoff Greene	Senior Director of Environmental Compliance	geoffrey.greene@evergy.com	785-575-6420
Evergy Kansas South, Inc.	Kansas City	Missouri	Geoff Greene	Senior Director of Environmental Compliance	geoffrey.greene@evergy.com	785-575-6420
Evergy Metro, Inc.	Kansas City	Missouri	Geoff Greene	Senior Director of Environmental Compliance	geoffrey.greene@evergy.com	785-575-6420
Evergy Missouri West, Inc.	Kansas City	Missouri	Geoff Greene	Senior Director of Environmental Compliance	geoffrey.greene@evergy.com	785-575-6420

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Exelon Generation Company, LLC	Kennett Square	Pennsylvania	Donna Fabrizio; Lance Martin	Sr. Environmental Specialist; Sr. Environmental Specialist	donna.fabrizio@exeloncorp.com ; lance.martin@exeloncorp.com	267-533-1126; 267-533-1470
Fort Armistead Road -- Lot 15 Landfill, LLC	Baltimore	Maryland	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Georgia Power Company	Atlanta	Georgia	Christina Coleman Robinson	Environmental Affairs Supervisor	ccoleman@southernco.com	404-506-7016
Great Plains Natural Gas Co.	Bismarck	North Dakota	Andy McDonald	Environmental Scientist	andy.mcdonald@mdu.com	701-222-7941
Great River Energy	Maple Grove	Minnesota	Cassie Johnston	Environmental Administrator	cjohnston@greenergy.com	763-445-5204
Gregory Power Partners LLC	Gregory	Texas	Carl Burch	Environmental Manager, Regulatory Compliance	carl.burch@nrg.com	713-537-2333
H.A. Wagner, LLC	Curtis Bay	Maryland	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Hawai'i Electric Light Company, Inc.	Hilo	Hawai'i	Donielle Comeau	Senior Environmental Scientist	donielle.comeau@hawaiianelectric.com	808-543-4509
Hawaiian Electric Company, Inc.	Honolulu	Hawai'i	Donielle Comeau	Senior Environmental Scientist	donielle.comeau@hawaiianelectric.com	808-543-4509
Hays Energy LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Holland Energy LLC	Beecher City	Illinois	S. Dear Schramm-Satayathum	Manager of Environmental Affairs	d_schramm@wvpa.com	317-481-2868
Holtwood, LLC	Allentown	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Hoosier Energy REC	Bloomington	Indiana	Dave Appel	Environmental Specialist	dappel@hepn.com	812-876-0301
Hope Gas, Inc.	Clarksburg	West Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2998
Hopewell Cogeneration, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Huntley Power LLC	Tonawanda	New York	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Illinois Power Generating Company	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Illinois Power Resources Generating, LLC	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Indian River Power LLC	Dagsboro	Delaware	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Indiana Michigan Power	Fort Wayne	Indiana	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Indianapolis Power & Light Company (IPL)	Indianapolis	Indiana	Angelique Collier	Director of Environmental Affairs	angelique.collier@aes.com	
Intermountain Gas Company	Boise	Idaho	Andy McDonald	Environmental Scientist	andy.mcdonald@mdu.com	701-222-7941

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Jersey Central Power and Light	Holmdel	New Jersey	John Greco	Regional Environmental Coordinator		973-989-2224
Kentucky Power	Ashland	Kentucky	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Kentucky Utilities	Louisville	Kentucky	W. Paul Puckett	Senior Engineer, LG&E and KU Environmental Affairs Department		502-627-4659
KeySpan Gas East Corporation	Hicksville	New York	Christopher Corrado	Environmental Manager	christopher.corrado@nationalgrid.com	516-545-2556
Kincaid Generation, LLC	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Lake Road Generating Company, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Laredo, LLC	Laredo	Texas	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Liberty Electric Power, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
LMBE Project Company, LLC	Bangor	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Long Beach Generation LLC	Long Beach	California	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Los Angeles Department of Water & Power	Los Angeles	California	Mr. Gareth Howell		gareth.howell@ladwp.com	213-367-4989
Louisville Gas and Electric	Louisville	Kentucky	W. Paul Puckett	Senior Engineer, LG&E and KU Environmental Affairs Department		502-627-4659
Luminant Generation Company LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Luminant Mining Company LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Martins Creek, LLC	Allentown	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Massachusetts Electric Company	Waltham	Massachusetts	Peter Harley	Environmental Manager	peter.harley@nationalgrid.com	781-907-3701
MASSPOWER, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Maui Electric Company, Ltd.	Kahului	Hawai'i	Donielle Comeau	Senior Environmental Scientist	donielle.comeau@hawaiianelectric.com	808-543-4509
MC Project Company, LLC	Bangor	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Metropolitan Edison	Reading	Pennsylvania	Tony Gober	Regional Environmental Coordinator		717-848-7231
MetSouth, Inc.	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794

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Michigan Gas Utilities Corporation	Monroe	Michigan	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
MidAmerican Energy Company	Des Moines	Iowa	Josh Van Winkle			515-281-2953
Mid-Atlantic Transmission, LLC	Akron	Ohio	Guy Gockley	Consulting Engineer		610-921-6920
Middletown Power LLC	Middletown	Connecticut	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Midlothian Energy, LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Midwest Electric Power, Inc.	Irving	Texas	Phil Morris	Sr. Director Environmental Services	phil.morris@vistraenergy.com	618-343-7794
Midwest Generation, LLC	Pekin	Illinois	Sharene Shealey		Sharene.shealey@nrg.com	724-255-3220
Milford Power Company, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Millenium Power Partners, LP	Charlton	Massachusetts	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenergy.com	610-601-0505
Minnesota Energy Resources Corporation	Rosemount	Minnesota	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
Minnkota Power Cooperative	Grand Forks	North Dakota	Terry Johnson	Environmental Engineer	tjohnson@minnkota.com	701-795-4000
Mississippi Power Company	Gulfport	Mississippi	Patrick Chubb	Environmental Specialist	pachubb@southernco.com	228-897-6438
Monongahela Power	Fairmont	West Virginia	Jason Starheim	Regional Environmental Coordinator		304-534-7430
Montana-Dakota Utilities Co.	Bismarck	North Dakota	Andy McDonald	Environmental Scientist	andy.mcdonald@mdu.com	701-222-7941
Montour, LLC	Washingtonville	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenergy.com	610-601-0505
Montville Power LLC	Uncasville	Connecticut	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Nantucket Electric Company	Waltham	Massachusetts	Peter Harley	Environmental Manager	peter.harley@nationalgrid.com	781-907-3701
National Fuel Gas Distribution	Williamsville	New York	Katie Hoelscher	Environmental Analyst II	hoelscherk@natfuel.com	716-857-7236
National Fuel Gas Supply Corporation	Williamsville	New York	Katie Hoelscher	Environmental Analyst II	hoelscherk@natfuel.com	716-857-7236
National Grid Generation LLC	Hicksville	New York	Christopher Corrado	Environmental Manager	christopher.corrado@nationalgrid.com	516-545-2556
NE Hub Partners, L.P.	Clarksburg	West Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Nevada Power Company	Las Vegas	Nevada	Tony Garcia	Manager, Environmental Services	tgarcia@nvenergy.com	702-402-5767

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

<u>Company Name</u>	<u>City</u>	<u>State</u>	<u>PCB Contact</u>	<u>Title</u>	<u>Email</u>	<u>Phone</u>
New Athens Generating Company, LLC	Athens	New York	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
New England Power Company	Waltham	Massachusetts	Peter Harley	Environmental Manager	peter.harley@nationalgrid.com	781-907-3701
Newark Bay Cogeneration Partnership, LP	Newark	New Jersey	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Niagara Mohawk Power Corporation	Syracuse	New York	Philip George	Environmental Manager	philip.george@nationalgrid.com	315-428-6685
NiSource	Merillville	Indiana	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
North Shore Gas Company	Chicago	Illinois	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berth@wecenergygroup.com	414-221-4045
Northeastern Power Company	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Northern Indiana Public Service Company, LLC (NIPSCO)	Merillville	Indiana	Maureen Turman	Director of Environmental Policy and Sustainability	mturman@nisource.com	219-647-4887
Northern States Power Company, a Minnesota Corporation (NSPM)	Minneapolis	Minnesota	Glenn Giefer	Environmental Analyst	Glenn.giefer@xcelenergy.com	612-337-2085
Northern States Power Company, a Wisconsin Corporation (NSPW)	Eau Claire	Wisconsin	Tina Ball	Environmental Analyst	christine.m.ball@xcelenergy.com	715-737-1346
Norwalk Harbor Power LLC	South Norwalk	Connecticut	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
NRG Texas Power LLC	Houston	Texas	Carl Burch	Environmental Manager, Regulatory Compliance	carl.burch@nrg.com	713-537-2333
NSTAR Electric Company	Boston	Massachusetts	Linda Macary	Manager, Environmental Operations, Environmental Field Response Service Co.	linda.macary@eversource.com	203-245-5374
NSTAR Gas Company	Boston	Massachusetts	Linda Macary	Manager, Environmental Operations, Environmental Field Response Service Co.	linda.macary@eversource.com	203-245-5374
Nueces Bay, LLC	Corpus Christi	Texas	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Oak Grove Management Company LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
OGE Energy Corporation	Oklahoma City	Oklahoma	Ford Benham		benhamrf@oge.com	405-553-3221
Ohio Edison	Akron	Ohio	Michael Gordon	Regional Environmental Coordinator		330-740-7502

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

<u>Company Name</u>	<u>City</u>	<u>State</u>	<u>PCB Contact</u>	<u>Title</u>	<u>Email</u>	<u>Phone</u>
Ohio Power Company	Columbus	Ohio	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Ohio Valley Electric Corporation	Piketon	Ohio	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Oklahoma Gas and Electric Company	Oklahoma City	Oklahoma	Ford Benham		benhamrf@oge.com	405-553-3221
Omaha Public Power District	Omaha	Nebraska	Deena Silke	PCB Program Specialist	dsilke@oppd.com	531-226-2105
Oncor Electric Delivery Company LLC	Dallas	Texas	Edward Zarecky	Environment Technical Services Mangaer	edward.zarecky@oncor.com	214-486-6168
Oncor Electric Delivery Company NTU LLC	Dallas	Texas	Edward Zarecky	Environment Technical Services Mangaer	edward.zarecky@oncor.com	214-486-6168
Ontelaunee Power Operating Company LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Orange & Rockland Utilities, Inc.	Pearl River	New York	Bobta Kim	Senior Specialist	kimb@oru.com	845-577-2343
Oswego Harbor Power LLC	Oswego	New York	David Bacher	Senior Regional Manager	david.bacher@nrg.com	302-540-0327
Otter Tail Power Company	Fergus Falls	Minnesota	Paul Vukonich	Principal, Environmental Services	pvukonich@otpc.com	218-739-8349
Pacific Power	Portland	Oregon	Brian King	Manager of Environmental Services	brian.king@pacificorp.com	503-813-6031
PECO	Philadelphia	Pennsylvania	Keith Kowalski	Manager of Environmental Management	keith.kowalski@exeloncorp.com	
Pedricktown Cogeneration Company LP	Pedricktown	New Jersey	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Pennsylvania Electric	Erie	Pennsylvania	Karen Kenkay	Regional Environmental Coordinator		814-949-4717
Pennsylvania Mines, LLC	Allentown	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Pennsylvania Power	Akron	Ohio	Michael Gordon	Regional Environmental Coordinator		303-740-7502
Pepco	Washington	District of Columbia	Charles May	Sr. Environmental Program Manager	charles.may@pepcoholdings.com	302-429-3542
Piedmont Natural Gas Company, Inc.	Charlotte	North Carolina	Jen McDaniel	Senior Environmental Specialist	jen.mcdaniel@duke-energy.com	513-287-2082
Pleasants Energy, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
PNM Resources (PNMR)	Albuquerque	New Mexico	Claudette Horn	Senior Manager Environmental Services	claudette.horn@PNMResources.com	505-241-2019
Portland General Electric Company	Portland	Oregon	Chris Bozzini		christopher.bozzini@pgn.com	503-464-7853

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

<u>Company Name</u>	<u>City</u>	<u>State</u>	<u>PCB Contact</u>	<u>Title</u>	<u>Email</u>	<u>Phone</u>
Potomac Edison	Williamsport	Maryland	Bob Summers	Regional Environmental Coordinator		304-901-7823
PowerSouth Energy Cooperative	Andalusia	Alabama	Dr. Keith Stephens	PowerSouth Environmental Services Manager	keith.stephens@powersouth.com	334-427-3373
PSEG Fossil LLC	South Plainfield	New Jersey	Michael Pego	Sr. Environmental Specialist	michael.peggo@pseg.com	908-577-2161
PSEG Long Island	Hicksville	New York	Hardik Parekh	Senior Environmental Specialist	hardik.parekh@pseg.com	
PSEG Nuclear, LLC	Hancocks Bridge	New Jersey	David F. Potts	Principal Environmental Specialist	david.potts@pseg.com	856-339-1404
Public Service Company of Colorado	Denver	Colorado	Nick Pizzuti	Environmental Analyst	nick.pizzuti@xcelenergy.com	303-571-3779
Public Service Company of New Hampshire	Manchester	New Hampshire	Linda Macary	Manager, Environmental Operations, Environmental Field Response Service Co.	linda.macary@eversource.com	203-245-5374
Public Service Company of New Mexico	Albuquerque	New Mexico	Claudette Horn	Senior Manager Environmental Services	claudette.horn@PNMResources.com	505-241-2019
Public Service Company of North Carolina Incorporated	Cayce	South Carolina	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Public Service Company of Oklahoma	Tulsa	Oklahoma	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Public Service Electric & Gas Company	Newark	New Jersey	Robin Hoy	Regulatory Programs Manager	robin.hoy@pseg.com	
Questar Energy Services, Inc.	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Questar Field Services, LLC	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Questar Gas Company	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Questar Southern Trails Pipeline Company	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Richland-Stryker Generation, LLC	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Rocky Mountain Power	Salt Lake City	Utah	Aaron Norton	Senior Environmental Analyst	aaron.norton@pacificorp.com	801-220-2535
Santee Cooper	Moncks Corner	South Carolina	Susan Jackson	Manager Waste Management	susan.jackson@santeecooper.com	843-761-8000, ext. 5664
Sierra Pacific Power Company	Las Vegas	Nevada	Tony Garcia	Manager, Environmental Services	tgarcia@nvenergy.com	702-402-5767

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

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Sithe/Independence Power Partners, LP	Irving	Texas	Vincent Dodge	Director Environmental	vincent.dodge@vistraenergy.com	315-349-5109
Solar Power Partners I, LLC	Nipton	California	George Piantka	Senior Director	george.piantka@nrg.com	760-930-1505
Solar Power Partners II, LLC	Nipton	California	George Piantka	Senior Director	george.piantka@nrg.com	760-930-1505
Solar Power Partners VIII, LLC	Nipton	California	George Piantka	Senior Director	george.piantka@nrg.com	760-930-1505
Southern California Edison Company	Rosemead	California	David Asti	Principal Advisor	David.Asti@sce.com	916-441-3966
Southern Indiana Gas and Electric Company	Houston	Texas	Angela Casbon-Scheller	Manager Environmental Operations	angela.casbon-scheller@centerpointenergy.com	812-491-4787
Southwestern Electric Power Company	Shreveport	Louisiana	Daniel E. Mains	Environmental Engineer Senior	demains@aep.com	614-716-3374
Southwestern Public Service	Amarillo	Texas	Heidi Gruner	Environmental Analyst	heidi.gruner@xcelenergy.com	806-378-2593
Sunflower Electric Power Corporation	Hays	Kansas	Ian Bosmeijer	Environmental Coordinator	ibosmeijer@sunflower.net	620-277-4558
Susquehanna Nuclear, LLC	Berwick	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
System Energy Resources, Inc.	Jackson	Mississippi	Jason Bourgeois	Sr. Lead Environmental Analyst	jbourg3@entergy.com	504-846-6819
Talen Montana, LLC	The Woodlands	Texas	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenenergy.com	610-601-0505
Tennessee Valley Authority	Knoxville	Tennessee	Kenneth Hickerson	Solid Waste Specialist	kfhickerson@tva.gov	423-751-7561
Texas New Mexico Power	Lewisville	Texas	Claudette Horn	Senior Manager Environmental Services	claudette.horn@PNMResources.com	505-241-2019
The Connecticut Light and Power Company	Berlin	Connecticut	Linda Macary	Manager, Environmental Operations, Environmental Field Response Service Co.	linda.macary@eversource.com	203-245-5374
The East Ohio Gas Company	Cleveland	Ohio	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
The Illuminating Company	Brecksville	Ohio	Gary Chack	Regional Environmental Coordinator		440-717-6802
The Narragansett Electric Company	Waltham	Massachusetts	Peter Harley	Environmental Manager	peter.harley@nationalgrid.com	781-907-3701
The Peoples Gas Light and Coke Company	Chicago	Illinois	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berth@wecenergygroup.com	414-221-4045
Toledo Edison	Holland	Ohio	Tyler Leggett	Regional Environmental Coordinator		419-249-5111
Tri-State Generation and Transmission Assn., Inc.	Westminster	Colorado	Kate Willeford	Sr. Environmental Planner	kwilleford@tristategt.org	303-254-3179

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

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Tucson Electric Power Company	Tucson	Arizona	Monette L. Greer	Supervisor of Corporate Environmental Compliance & Permits	mgreer@tep.com	520-918-8378
UniSource Energy Services	Tucson	Arizona	Monette L. Greer	Supervisor of Corporate Environmental Compliance & Permits	mgreer@tep.com	520-918-8378
UNS Electric, Inc.	Tucson	Arizona	Monette L. Greer	Supervisor of Corporate Environmental Compliance & Permits	mgreer@tep.com	520-918-8378
UNS Energy Corporation	Tucson	Arizona	Monette L. Greer	Supervisor of Corporate Environmental Compliance & Permits	mgreer@tep.com	520-918-8378
UNS Gas, Inc.	Tucson	Arizona	Monette L. Greer	Supervisor of Corporate Environmental Compliance & Permits	mgreer@tep.com	520-918-8378
Upper Michigan Energy Resources Corporation	Pelkie	Michigan	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
Vienna Power LLC	Vienna	Maryland	David Bacher	Senior Regional Manager	david.bacher@nrgenergy.com	302-540-0327
Virginia Electric and Power Company	Richmond	Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Virginia Power Nuclear Services Company	Richmond	Virginia	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Vistra Operations Company LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Wabash Valley Power Alliance	Indianapolis	Indiana	S. Dear Schramm-Satayathum	Manager of Environmental Affairs	d_schramm@wvpa.com	317-481-2868
WEC Infrastructure LLC	Milwaukee	Wisconsin	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
West Pennsylvania Power	Greensburg	Pennsylvania	Brenda Buerger	Regional Environmental Coordinator		724-830-2904
Wexpro Company	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Wexpro Development Company	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Wexpro II Company	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Wharton County Generation, LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
White River Hub, LLC	Salt Lake City	Utah	Dell Cheatham	Environmental Specialist III	dell.cheatham@dominionenergy.com	804-273-2988
Wisconsin Electric Power Company DBA We Energies	Milwaukee	Wisconsin	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045

USWAG Member Companies Requesting Inclusion on PCB Remediation Waste Disposal Approval

<u>Company Name</u>	<u>City</u>	<u>State</u>	<u>PCB Contact</u>	<u>Title</u>	<u>Email</u>	<u>Phone</u>
Wisconsin Gas LLC DBA We Energies	Milwaukee	Wisconsin	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
Wisconsin Public Service Corporation	Green Bay	Wisconsin	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
Wisconsin River Power Company	Green Bay	Wisconsin	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
Wise Country Power Company, LLC	Irving	Texas	Kim Mireles	Sr. Director Environmental Services	kimberly.mireles@luminant.com	214-875-8382
Wispark LLC	Milwaukee	Wisconsin	Stephanie Berti	Manager-Waste Recycling & Disposal	stephanie.berti@wecenergygroup.com	414-221-4045
Wolf Creek Nuclear Operating Corporation	Burlington	Kansas	Geoff Greene	Senior Director of Environmental Compliance	geoffrey.greene@evergy.com	785-575-6420
Xcel Energy Inc.	Minneapolis	Minnesota	Roger Clarke	Environmental Analyst	roger.a.clarke@xcelenergy.com	612-330-6989
Xcel Energy Services Inc.	Minneapolis	Minnesota	Roger Clarke	Environmental Analyst	roger.a.clarke@xcelenergy.com	612-330-6989
Yankee Gas Services Company	Berlin	Connecticut	Linda Macary	Manager, Environmental Operations, Environmental Field Response Service Co.	linda.macary@eversource.com	203-245-5374
York Generation Company LLC	York	Pennsylvania	Craig Shamory	Environmental Policy & Strategy Manager	craig.shamory@talenergy.com	610-601-0505

Message

From: Roewer, James [JRoewer@eei.org]
Sent: 2/21/2018 6:58:12 PM
To: Johnson, Barnes [Johnson.Barnes@epa.gov]; Walsh, Ed [Walsh.Ed@epa.gov]; Brown, Byron [brown.byron@epa.gov]
CC: Odom, Cal [COdom@eei.org]; Franks, Jessica [JFranks@eei.org]
Subject: FY 2019 Appropriation for CCR Federal Permit Programs in Non-Participating States

We are writing in follow-up to the February 15th message from American Electric Power, FirstEnergy and Southern Company regarding appropriations to support the implementation of the federal Coal Combustion Residuals (CCR) Rule through federal permit programs.

We echo the concerns of our member companies, and we urge EPA to revise its funding requests to identify the resources necessary for it to implement a CCR permit program in “non-participating states” per the language in the Water Infrastructure Improvements for the Nation Act (WIIN Act), enacted in December 2016. It is critically important that EPA convey to the Senate and House Appropriations Committees how much you believe is necessary for this purpose.

One of the biggest flaws in the CCR Rule is its self-implementing nature which we believe will lead to an unpredictable patchwork of interpretation by federal District Courts’ rulings in citizen suit enforcement cases. Fulfilling the promise of the WIIN Act, designed to ultimately eliminate the self-implementing nature of the rule and replace it with either a state or federal CCR permit program, is contingent on both the approval of state permit programs and on the funding of a federal CCR permit program.

We will therefore continue to advocate for specific funding in both FY 2018 and 2019 appropriations bills and we urge you to identify to Congress the budget necessary for EPA to implement federal CCR permit programs in non-participating states.

Jessica Franks
jfranks@eei.org
Edison Electric Institute



Cal Odom
codom@eei.org
Edison Electric Institute



Jim Roewer
Jim.roewer@uswag.org
USWAG



Message

From: Foley, Allison D. [ADFoley@Venable.com]
Sent: 3/11/2019 6:21:04 PM
To: ORCRPCBs [ORCRPCBs@epa.gov]
CC: Johnson, Barnes [Johnson.Barnes@epa.gov]; McLeod, Jennifer [McLeod.Jennifer@epa.gov]; Swetland-Johnson, Karen [Swetland-Johnson.Karen@epa.gov]; 'jim.roewer@uswag.org' [jim.roewer@uswag.org]; Green, Douglas H. [DHGreen@Venable.com]
Subject: USWAG Request for Renewal of PCB Remediation Waste Disposal Approval
Attachments: USWAG APPROVAL RENEWAL REQUEST 2019.03.11.pdf

Hello,

Attached on behalf of the Utility Solid Waste Activities Group (USWAG) please find USWAG's request for renewal of the PCB remediation waste disposal approval first issued to USWAG members on June 10, 2014. This request is submitted on behalf of current USWAG members listed in Appendix II of the initial disposal approval and the subsequent approval issued on April 12, 2016 (see Attachment A, appended to the attached request).

Please confirm receipt of this email, and please contact me with any questions regarding this request. Thank you for your consideration of USWAG's request.

Best,

Allison D. Foley, Esq. | Venable LLP
t 202.344.4416 | f 202.344.8300 | m 845.797.6635
600 Massachusetts Avenue, NW, Washington, DC 20001

ADFoley@Venable.com | www.Venable.com

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c/o Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, DC 20004-2696
202-508-5645
www.uswag.org

March 11, 2019

VIA ELECTRONIC AND U.S. MAIL

Mr. Barnes Johnson, Director
Office of Resource Conservation and Recovery
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code: 5301P
Washington, DC 20460

Re: Application for Renewal of Risk-Based Disposal Approval for Certain As-Found < 50 ppm PCB Remediation Wastes from Electric and Natural Gas Utility Operations Issued to USWAG Members

Dear Mr. Johnson:

The Utility Solid Waste Activities Group (“USWAG”)¹ submits this application on behalf of its members for renewal of the risk-based disposal approval first issued to USWAG members on June 10, 2014² pursuant to 40 C.F.R. § 761.61(c), authorizing the disposal of certain PCB Remediation Wastes³ generated at secure utility assets with as-found concentrations of < 50 ppm PCBs in non-TSCA units, including municipal solid waste landfills (“MSWLFs”) (the “Approval”). Condition 13 of the Approval (“Expiration/Renewal”) provides that the Approval shall be effective for a period of five years from the date of signature and that, “[i]n order to continue operating under these Approvals pending EPA action on reissuance, USWAG Members, individually or through USWAG, must submit written renewal applications to EPA at least 90 days prior to the expiration date of these Approvals.” Condition 13 further provides that the

¹ USWAG, formed in 1978, is an association of over one hundred and thirty electric utilities, power producers, utility operating companies, and utility service companies located throughout the United States, including the Edison Electric Institute (“EEI”), the American Gas Association (“AGA”), the American Public Power Association (“APPA”), and the National Rural Electric Cooperative Association (“NRECA”). Together, USWAG members represent more than 73% of the total electric generating capacity of the United States, and service more than 95% of the nation’s consumers of electricity.

² A substantively identical version of the Approval has been issued to new USWAG members (*i.e.*, those not a member of USWAG, or otherwise not listed in Appendix II to the Approval, at the time of the June 10, 2014 Approval issuance) on April 12, 2016, with an expiration date coinciding with that of the original Approval (*i.e.*, June 10, 2019). This request therefore seeks renewal of the Approval for all USWAG members to whom the Approval is currently issued (*i.e.*, all current members listed on the original Appendix II and in the Appendix II of subsequent approvals), as identified in Attachment A to this renewal request. The granting of this renewal request would therefore effectively start a single five-year renewal term for all USWAG members to whom the Approval is currently issued.

³ The term “Remediation Waste” is used throughout this application to refer to wastes defined as PCB Remediation Wastes in the Approval, which in turn incorporates the definition of “PCB remediation waste” set forth at 40 C.F.R. § 761.3.

Approval shall remain in effect beyond the expiration date (*i.e.*, June 10, 2019 for those USWAG members listed in Appendix II of the original Approval document) if a renewal application has been submitted at least 90 days before such expiration date and if, “through no fault of USWAG or USWAG members, EPA has not issued renewed Approvals, a denial of an application for Approvals’ renewal, or an official termination of the Approvals.”

USWAG hereby requests that the Approval be renewed for a new five-year term beginning on June 10, 2019. As discussed below, USWAG is also requesting certain clarifications and updates to the Approval that will improve the utility of the Approval, increase administrative efficiency, and promote and expedite cleanup activities while remaining protective of health and the environment. While USWAG is happy to provide more information or discuss these suggested clarifications and updates to the existing Approval at the Agency’s convenience, these are intended to be supplemental to this application which seeks renewal and extension of the existing Approval terms. Should the Agency decline to affirmatively grant or otherwise respond to this request, including the clarifications and updates suggested herein, it is USWAG’s understanding and intention that the current terms and conditions of the Approval shall remain in effect based on this timely renewal request per Condition 13(a)-(b) of the Approval.

Basis for Request to Renew Approval Terms

The Agency has, in the context of the original June 10, 2014 Approval and in subsequent similar approvals, found that the disposal of PCB Remediation Waste with as-found concentrations of < 50 ppm PCB in accordance with the terms and conditions of the Approval “meets the requirements of [40 C.F.R.] § 761.61(c), and will not result in an unreasonable risk to health or the environment.”⁴ USWAG provided a detailed explanation of specific Approval terms and conditions and the justification therefore, including an explanation of why the disposal authorized by the Approval, under the conditions required by the Approval, will present no unreasonable risk to health or the environment, in its April 4, 2012 application (the “2012 Application,” attached hereto as Attachment B, not including original attachments) which formed the basis for the June 10, 2014 Approval. The 2012 Application is therefore incorporated herein and supports this request for renewal of the Approval.

Additional Requests for Modification/Clarification of Approval Terms

As noted above, in addition to USWAG’s request for renewal of the existing Approval for all USWAG members to whom the Approval is currently issued, USWAG requests that EPA amend the Approval along the following lines:

⁴ See EPA cover letter accompanying June 10, 2014 Approval.

1. Public Notice Requirements (Approval Condition 4)

Condition 4 of the Approval sets forth the general, one-time (standing) public notice requirement that each USWAG member wishing to utilize the Approval must fulfill. In order to provide clarity to USWAG members and to members of the public viewing these materials, USWAG requests that the Approval be amended to include the following language, reflected in bold-face and underlined below as an addition to the existing Condition 4 language:

To provide information to the public, no less than two working days before the first shipment of PCB Remediation Waste leaves the control of each USWAG Member utilizing these Approvals, the USWAG Member shall post prominently on their website this approval document and a notice to the public stating that the Approval allows the Member to dispose of PCB Remediation Waste with as-found concentrations of < 50 ppm PCBs in non-TSCA approved landfill facilities, including MSWLFs, as defined in Condition 9. Such notification shall be considered “prominent” for purposes of this condition if posted on a part of the USWAG Member’s website where a visitor to the website would reasonably expect to see announcements of environmental projects or community outreach activities, including for example and without limitation, an Environmental Services webpage of the USWAG Member’s website. The notice shall include contact information **of an individual employed by, or an office of, the USWAG Member to be used by** individuals seeking additional information from the USWAG Member **regarding the existence, applicability, and/or use of the Approvals**. This notice and the copy of the Approvals shall stay posted on the Member’s website until these Approvals expire.

While this language represents a slight departure in form from the June 10, 2014 Approval, it is identical to the corresponding provisions in the nationwide approval document issued to members of the National Rural Electric Cooperative Association (“NRECA”) on February 9, 2016 (the “NRECA Approval”), demonstrating that EPA has found this modification to the Approval terms consistent with the spirit of the Approval and to represent no unreasonable risk to health or the environment. In addition, the language clarifying where on a company’s website this posting should be made is drawn from EPA’s Response to Comments document issued in connection with the June 10, 2014 Approval.

2. Notification Requirements (Approval Condition 5(A))

USWAG requests that EPA clarify the language of Condition 5(A) to make clear that, while the notification form provided in Appendix III of the Approval *may* be utilized as a template for notifications required under Condition 5(A), the use of the form is optional (*i.e.*, notification meeting the requirements of Condition 5(A) will be deemed compliant with the terms of the

Approval even if the Appendix III form is not used to convey the information). This clarity could be provided by amending the relevant language of Condition 5(A) as follows, adding the new suggested language reflected in bold-faced underline: "The notification shall contain the following information, **and may be provided in the form attached hereto as Appendix III: ...**"

3. Notification Requirements (Approval Condition 5(C)) / Membership Changes (Approval Condition 12)

USWAG respectfully requests that EPA amend the Approval to remove the requirement set forth at Condition 5(C), which currently states that:

USWAG shall submit electronically a list of current members, highlighting any changes to the previous list (including companies added and removed), in an updated "Appendix II: USWAG Members" to ORCR's Cleanup Programs Branch Chief at the end of each fiscal quarter (the end of March, June, September, and December; see Condition 12).

This requirement is also referenced in Condition 12 of the Approval, which provides that:

In the event that USWAG's membership changes and a company that joins USWAG wants to obtain an approval with the same conditions, USWAG shall submit electronically a list of current members in an updated "Appendix II: USWAG Members" to ORCR's Cleanup Programs Branch Chief at the end of a fiscal quarter (the end of March, June, September, and December). USWAG shall specify the new members in each quarterly update. Upon receipt of a quarterly submission, and to the extent that new companies join USWAG, EPA intends to publish for public comment a draft approval containing the same terms as these Approvals for each new company.

In the event that a Member leaves USWAG, USWAG shall include a list of any leaving members from the past quarter in their quarterly submission required above. Those companies shall continue to be able to utilize their approvals and will continue to be listed on Appendix II until their approvals expire.

The standalone requirement of Condition 5(C) is therefore duplicative of the requirements of Condition 12. More importantly, however, the inclusion of a condition that turns on affirmative action to be taken by the association (*i.e.*, USWAG) in an approval that is clearly issued to individual member companies is inappropriate as the individual companies to whom the Approval is issued are not in a position to ensure compliance with this condition of the Approval. Moreover, the condition of a quarterly submission by USWAG is unnecessary, since any new USWAG

members would be issued the Approval only after a draft approval, specific to that new member, was issued for public review and comment.

EPA appeared to recognize this issue in granting similar nationwide approvals to NRECA and to the American Public Power Association ("APPA") on February 9, 2016 and September 28, 2017, respectively. Neither the NRECA nor the APPA approval document includes a requirement mirroring that set forth in Condition 5(C) of the USWAG Approval. And, in both the NRECA approval and the APPA approval, Condition 12 has been modified to provide that the list of new members will be provided to EPA by the association "as needed" if a new member wants to obtain an approval with the same conditions, and to allow the *option* for the association to provide EPA a quarterly update identifying companies that are no longer members of the association, rather than a *requirement* upon which the approval is conditioned. USWAG requests that, in addition to removing Condition 5(C) from the Approval, EPA modify Condition 12 along the same lines as the corresponding provision in the NRECA and APPA approvals.

4. Record Keeping (Approval Condition 6)

USWAG requests that EPA amend the Approval to clarify that the records required to be maintained (and made available upon request to EPA) in connection with the Approval may be in hard copy or electronic format. This is consistent with the approval terms issued in similar nationwide risk-based disposal approvals issued to NRECA and APPA.

5. Waste Characterization (Approval Condition 7) / Waste Analysis (Approval Condition 8)

Condition 7 of the Approval specifies the waste characterization procedures available to a USWAG member utilizing the Approval. To address improved and updated methods and procedures that have been and/or are in the future accepted by EPA and addressed or referenced in updated EPA guidance, USWAG requests that EPA modify the existing language of this condition to include language along the lines of the following, as reflected in bold-faced, underline type: "The USWAG Member shall characterize, at the time of discovery, the PCB Remediation Waste in accordance with one of the following procedures, as applicable to the particular substrate, to verify that the PCB Remediation Waste does contain as-found concentrations of < 50 ppm PCB: (1) 40 C.F.R. § 761.265; (2) EPA guidance entitled *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs)*, Revision 4 (May 5, 2011), **as that document may be amended, replaced, and/or superseded**; or (3) for non-porous surfaces only, standard wipe test as specified in 40 C.F.R. § 761.123."

Similarly, USWAG requests that EPA amend Condition 8, "Waste Analysis," to allow chemical extraction and analysis to be conducted "in accordance with the most current extraction version of EPA Methods 3500, 3540, 3541, 3545 and 3550 in EPA's SW-846, Test Methods for Evaluating Solid Waste, and chemical analysis for PCBs using the most current version of EPA Method 8082 in EPA's SW-846." This modification would allow USWAG members utilizing the Approval to use the most current extraction and analysis methods demonstrated to be effective

(and, in many cases, used by EPA in connection with PCB and other waste and cleanup programs) and included in SW-846.

6. Applicability (Approval Conditions 1 and 3; Definitions)

Conditions 1 and 3 of the Approval provide that USWAG members may dispose of non-liquid PCB remediation wastes with as-found concentrations of < 50 ppm PCB in non-TSCA landfill facilities, including MSWLFs, provided the conditions of the Approval are met, and that the PCB remediation waste "is generated at a secure utility asset that is owned or operated by a USWAG Member." "Secure utility asset" is defined as follows:

"Secure utility asset" means a facility that is fenced, locked, guarded/monitored, or otherwise not accessible to the general public where PCB response actions are conducted and performed by, or under the supervision of, utility professionals and/or consultants with experience in responding to and remediating PCB releases. This includes, for example, service centers, substations, switch-yards, power generating stations, network vaults, gas utility distribution centers, and natural gas metering, regulating, and compressor stations and service centers that are properly fenced, locked, guarded/monitored, or otherwise not accessible to the general public.


To maximize the value of the Approval and promote efficient cleanups at a broader range of utility-controlled sites which are not accessed by the general public, USWAG requests that the approval be modified to include PCB remediation wastes generated at a "secured utility asset," defined as follows:

"Secured utility asset" means a facility that is or has been, within 24 hours of discovery of the PCB waste that will be disposed of under the Approval, fenced, locked, guarded/monitored, or otherwise not accessible to the general public where PCB response actions are conducted and performed by, or under the supervision of, utility professionals and/or consultants with experience in responding to and remediating PCB releases, where the PCB waste subject to the Approval has not been accessed by the general public. This includes, for example, service centers, substations, switch-yards, power generating stations, network vaults, gas utility distribution centers, and natural gas metering, regulating, and compressor stations and service centers that are properly fenced, locked, guarded/monitored, or otherwise not accessible to the general public, and areas surrounding pole-top or pad-mount transformers or other outside electrical or natural gas distribution equipment that is similarly secured within 24 hours of discovery of the PCB waste that will be disposed of under the Approval, provided members of the general public have not accessed or contacted the PCB waste.

This requested modification would expand the range of scenarios in which the Approval could be utilized, facilitating and expediting cleanup activities throughout the country, while ensuring that the Approval is only utilized at areas that are under the control and supervision of trained utility professionals and/or consultants with relevant experience and training responding to PCB releases. As a result, this modification would present no unreasonable risk to health or the environment and would in fact promote efficient and safe cleanup activities.

We thank EPA for considering these requested modifications that will promote administrative efficiency and add value to the Approvals not only for USWAG members but for the general public as well by promoting safe, effective, and efficient cleanups. USWAG is happy to provide any additional information that EPA may find useful as it considers this request for modification of the Approval terms. Please contact USWAG counsel Allison Foley (adfoley@venable.com; 202-344-4416) with questions or comments regarding these requests. In the meantime, please consider this letter the request for renewal of the existing Approval terms and conditions, submitted per Condition 13 of the Approval.

Sincerely,



James R. Roewer
Executive Director
Utility Solid Waste Activities Group

Attachments

Attachment A

APPENDIX II: USWAG Members Receiving Approval

AEP Ohio	Duke Energy Indiana, Inc.
AEP Texas	Duke Energy Kentucky, Inc.
AES Corporation	Duke Energy Ohio, Inc.
Alabama Power Company	Duke Energy Progress, Inc.
ALLETE	Duke Energy Renewables
Alliant Energy Corporation	Duquesne Light Company
Ameren Corporation	Dynegy
Ameren Illinois	Entergy Corporation
Ameren Missouri	Exelon
American Electric Power Company	FirstEnergy Corp.
	Georgia Power Company
Appalachian Power Company	Great Plains Energy, Inc.
Arizona's G&Ts	Great River Energy
Arizona Electric Power Cooperative, Inc.	Gulf Power
Arizona Public Service Company	Hawaiian Electric Company, Inc.
Atlantic City Electric	Hoosier Energy Rural Electric Cooperative, Inc.
Aurora Energy LLC	Iberdrola USA
Avista Corporation	Indiana Michigan Power
Avista Utilities	Indianapolis Power & Light Company
Baltimore Gas and Electric Company	Integrus Energy Group
Birchwood Power Partners	Interstate Power and Light Company
Buckeye Power Inc.	Jersey Central Power & Light
CenterPoint Energy, Inc.	KCP&L
Central Hudson Gas & Electric Corporation	Kentucky Power
Central Maine Power	LG&E and KU Energy
CMS Energy Corporation	Los Angeles Department of Water & Power
Commonwealth Edison Co. (ComEd)	Luminant
Consolidated Edison Co. of New York, Inc.	Madison Gas and Electric Company
Consolidated Edison, Inc.	Memphis Light, Gas, and Water Division
Consumers Energy	Metropolitan Edison
Dairyland Power Cooperative	MidAmerican Energy Company
Dayton Power & Light	MidAmerican Energy Holdings Company
Delmarva Power	Minnesota Power
Dominion	Mississippi Power Company
DTE Energy Company	Monongahela Power
Duke Energy	Montana-Dakota Utilities Co.
Duke Energy Carolinas, LLC	National Grid
Duke Energy Commercial Power	New York Power Authority
Duke Energy Florida, Inc.	New York State Electric & Gas (NYSEG)
	NISource, Inc.

Northeast Utilities
 Northern Indiana Public Service Co.
 NRG Energy, Inc.
 NSTAR
 NV Energy
 OGE Energy Corporation
 Ohio Edison
 Ohio Power Company
 Ohio Valley Electric Corporation
 Oncor Electric Delivery
 Orange and Rockland Utilities, Inc.
 Orlando Utilities Commission
 Pacific Gas & Electric Company
 PacifiCorp
 PECO Energy
 Pennsylvania Electric
 Pennsylvania Power
 Pepco
 Pepco Holdings, Inc.
 Pinnacle West Capital Corporation
 PNM
 PNM Resources, Inc.
 Portland General Electric
 Potomac Edison Power
 PowerSouth Energy Cooperative
 PPL Corporation
 PPL Electric Utilities Corporation
 Prairie State Generating Company, LLC
 Progress Energy Carolinas
 Progress Energy Florida
 Public Service Co. of New Hampshire
 Public Service Company of Oklahoma
 Public Service Electric and Gas Company
 Public Service Enterprise Group, Inc.
 Puget Energy, Inc.
 Puget Sound Energy
 Raven Power
 Rochester Gas & Electric

Salt River Project
 San Diego Gas & Electric Company
 SCANA Corporation
 Sempra Energy
 Sierra Southwest Cooperative Services, Inc.
 South Carolina Electric & Gas Company
 Southern California Edison Company
 Southern California Gas Company
 Southern Company
 Southern Nuclear
 Southwest Transmission Cooperative, Inc.
 Southwestern Electric Power Company
 Sunflower Electric Power Corporation
 Tampa Electric Company
 TECO Energy
 Tennessee Valley Authority
 Texas-New Mexico Power Company
 The Cleveland Electric Illuminating Co.
 The Connecticut Light and Power Co.
 The Detroit Edison Company
 Toledo Edison
 Topaz Power Management LLC
 Tri-State Generation & Transmission
 Tucson Electric Power Company
 Unisource Energy Corporation
 UniSource Energy Services
 Upper Peninsula Power Company
 Vectren Corporation
 Wabash Valley Power Association
 We Energies
 West Penn Power
 Westar Energy Inc.
 Western Massachusetts Electric Co.
 Wisconsin Power and Light Company
 Wisconsin Public Service Corporation
 Wolf Creek Nuclear Operating Corporation
 Xcel Energy, Inc.
 Yankee Gas Services Company

APPENDIX II: USWAG Members Receiving Approval

- Metropolitan Water District of Southern California
- Omaha Public Power District
- Santee Cooper
- South Carolina Public Service Authority

Attachment B

Utility Solid Waste Activities Group
c/o Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, DC 20004-2696
202-508-5645
www.uswag.org



April 4, 2012

VIA ELECTRONIC AND U.S. MAIL

Ms. Suzanne Rudzinski, Director
Office of Resource Conservation and Recovery
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 5301P
Washington, DC 20460

**RE: Application for Risk-Based Disposal Approval for <50 ppm PCB
Remediation Wastes from Electric and Natural Gas Utility Operations**

Dear Ms. Rudzinski:

The Utility Solid Waste Activities Group ("USWAG")¹ submits this application on behalf of its members for a risk-based disposal approval pursuant to 40 C.F.R. § 761.61(c) seeking approval to dispose of PCB Remediation Wastes² generated at secure utility assets with as-found concentrations of < 50 ppm PCBs in non-TSCA units, including municipal solid waste landfills ("MSWLFs"). The Agency has already determined that disposal of < 50 ppm PCBs in a non-TSCA unit, as contemplated in this application, will not pose an unreasonable risk of injury to health or the environment. This determination is expressed in a number of EPA documents and is evident in the fact that EPA currently authorizes PCB Remediation Wastes with as-found concentration of < 50 ppm generated under the self-implementing cleanup provision (40 C.F.R. § 761.61(a)) – but otherwise identical to the wastes that are the subject of this application – to be disposed of in MSWLFs and other non-TSCA units based on the actual (as-found) concentration of the PCB wastes.

This approved application will facilitate cleanups of PCB spills while utilizing the significant technical expertise acquired by electric and gas utilities through their decades of

¹ USWAG is an association of energy industry operating companies and associations, including the Edison Electric Institute ("EEI"), the American Gas Association ("AGA"), the American Public Power Association ("APPA"), and the National Rural Electric Cooperative Association ("NRECA"). Each current member of USWAG as of the date of this application, as listed in Attachment A to this application, constitutes an "Applicant," and a "person" within the meaning of 40 C.F.R. § 761.61(c). In this application, we refer to the applicants generally as the "utilities" or the "utility industry." These terms are intended to include those USWAG members listed in Attachment A that generate electricity but do not directly provide electricity to the public and are technically not "utilities."

² The term "Remediation Waste" is used throughout this application to refer to wastes defined as *PCB Remediation Waste* in 40 C.F.R. § 761.3.

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experience with the PCB management and disposal regulations.³ PCB remediation projects are complicated by the significant operational and cost impacts associated with the disposal of contaminated media, including especially the costs of disposing of wastes containing < 50 ppm PCBs in TSCA landfills. The granting of this application will provide immediate practical relief by removing these unnecessary cost and operational burdens on PCB remediation projects, without increasing exposure risks or adverse environmental impacts.

The elements of the risk-based disposal application, which applies only to disposal of PCB Remediation Wastes and not to cleanup of sites, are set forth below, followed by a discussion of EPA's previous statements and regulatory actions demonstrating that the requested disposal approval would not pose an unreasonable risk to human health or the environment.

I. Elements of the Risk-Based Disposal Approval

- A. *Applicability:*** Applicants may dispose of PCB remediation wastes with as-found concentrations of < 50 ppm PCBs⁴ in non-TSCA disposal units, including MSWLFs, provided (1) the conditions described in Section I of this application are satisfied, and (2) the PCB Remediation Waste is generated at a utility-owned, -operated, or -controlled secure asset. An asset is considered "secure" within the meaning of this application if it is fenced, locked, guarded/monitored, or otherwise not accessible to the general public. Secure utility-owned/operated/controlled assets include, for example, service centers, substations, switch-yards, power generating stations, network vaults, gas utility distribution centers, and natural gas metering, regulating, and compressor stations and service centers. These locations are not accessible to the general public and PCB response actions conducted within these areas are performed by, or under the supervision of, utility professionals and/or consultants with experience in responding to and remediating PCB releases.
- B. *Notification:*** Notification will be provided to the appropriate EPA Regional PCB Coordinator before the waste leaves the control of the Applicant unless an applicable federal or state law, regulation, or approval requires earlier notification. Applicants using the approval will submit notification to the appropriate EPA Regional PCB Coordinator by phone, fax, email, or certified mail using the attached form (Attachment B). The notification will contain the following information: (1) company name and address; (2) name and phone number of primary company contact; and (3) cleanup site location (street address, city, county, and state). PCB

³ By submitting this application, USWAG does not waive its legal position that the regulations already authorize the disposal of PCB Remediation Wastes with as-found concentrations of < 50 ppm in non-TSCA landfills. See e.g., August 6, 2007 letter to Roger Martella, then-General Counsel of EPA setting forth USWAG's position as to why the existing regulations *already* allow for disposal of *all* PCB Remediation Wastes with as-found concentrations of < 50 ppm PCBs in non-TSCA landfills

⁴ In the case of a PCB remediation waste comprised of a non-porous surface, the as-found PCB concentration on the surface shall be ≤ 10 ug/100 cm². The reference to < 50 ppm PCB remediation wastes in this application includes PCB remediation waste consisting of non-porous surfaces with a surface PCB contamination of ≤ 10 ug/100 cm².

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Remediation Wastes managed in accordance with the conditions of this approval shall not be subject to the requirements of 40 C.F.R. § 761.65 or Subparts J and K of 40 C.F.R. Part 761.

- C. *Recordkeeping:*** For every disposal activity undertaken in accordance with this approval, the applicant shall document the disposal activities with records that shall be maintained on-site, or at an appropriate facility owned or operated by the applicant, for a period of 5 years following the disposal, and shall make such records available upon request from EPA. The records shall consist of the following: (1) a copy of the notification form submitted to EPA under paragraph (B) of this section; (2) a brief description of the waste disposed of (*e.g.*, concrete, soil); (3) approximate amount of waste disposed of; (4) a brief description of the sampling methodology used to confirm as-found PCB concentrations of the waste; (4) and identification of the ultimate disposition of the waste (*i.e.*, name and location of MSWLF or other disposal site).
- D. *Waste Characterization:*** Applicants managing < 50 ppm PCB Remediation Wastes under the disposal approval will verify through sampling that the wastes in fact contain as-found PCB concentrations of < 50 ppm. The entity utilizing the approval will sample in accordance with any of the following federal guidance as applicable: for PCB remediation waste consisting of concrete, in accordance with EPA Region I guidance, "Standard Operating Procedure for Sampling Concrete in the Field" (dated 12/30/97)); for bulk PCB remediation wastes and porous surfaces, in accordance with the methods set forth in 40 C.F.R. §§ 761.130(a)-(e) or 761.265; for PCB remediation wastes consisting of non-porous surfaces, in accordance with the procedures for a standard wipe test as specified in 40 C.F.R. § 761.123; and/or according to other applicable sampling procedures approved by EPA.
- Chemical analysis for PCBs will be conducted in accordance with the most current extraction version of EPA Methods 3500, 3540, 3541, 3545 and 3550 in EPA's SW-846; and analyzed using the most current version of EPA Method 8082 in EPA's SW-846.
- E. *Disposal options:*** The approval will allow for < 50 ppm PCB Remediation Wastes to be disposed of in any of the following facilities: (1) facilities permitted, licensed, or registered by a state to manage municipal solid waste subject to 40 C.F.R. Part 258; (2) facilities permitted, licensed, or registered by a state to manage non-municipal non-hazardous waste subject to 40 C.F.R. §§ 257.5–257.30, as applicable, including, as appropriate, recommendations in EPA's Guide for Industrial Waste Management; (3) a RCRA-permitted hazardous waste landfill; (4) an approved PCB disposal facility; or (5) a facility permitted or licensed by a state or otherwise authorized by a state to manage waste with as-found concentrations of < 50 ppm PCBs.
- F. *Cleanup Equipment:*** Applicants operating under this approval will ensure that equipment used for conducting cleanup or waste sampling which is contaminated

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with, or has been in contact with, PCB remediation waste, as well as non-liquid cleaning materials and personal protective equipment are managed according to the requirements of 40 C.F.R. § 761.61(a)(5)(v).

G. Regulatory Compliance: Nothing in the approval relieves applicants of any obligations to comply with all other rules and regulations applicable to the activities subject to the approval.

H. Duration of Approval: The approval will remain in effect for a period of five (5) years from its effective date. USWAG may request an extension of the approval on behalf of its members at least nine (9) months before the end of this five-year period. The approval will remain in effect pending EPA's review of the extension request. EPA would reserve the right to modify or revoke the approval based on new information available to EPA that provided a basis to conclude that the activities covered by the approval pose an unreasonable risk to human health or the environment.

II. Approval of this Application Will Result in No Unreasonable Risk

The disposal of < 50 ppm PCB Remediation Wastes in the manner specified in this application will pose no "unreasonable risk of injury to health or the environment." See 40 C.F.R. § 761.61(c)(2). TSCA requires that EPA's PCB regulations, including the authorization of disposal of < 50 ppm PCB Remediation Wastes generated under 40 C.F.R. § 761.61(a) in non-TSCA units such as MSWLFs, be based on a finding of "no unreasonable risk." See 15 U.S.C. § 2605(e); 40 C.F.R. § 761.61(a)(5)(i)(B)(2)(ii); see also 63 Fed. Reg. 35384, 35385 (June 29, 1998) ("Under TSCA section 6(e), EPA makes decisions using the concept of 'unreasonable risk'"). Indeed, all of the PCB regulations, including the provision in § 761.61 allowing for PCB Remediation Wastes to be disposed of based on their "as-found" concentrations of PCBs, are based on a finding by EPA that such regulations will "not present an unreasonable risk of injury to health or the environment." TSCA § 6(e)(2)(B), 15 U.S.C. § 2605(e)(2)(B).

In a report prepared by EPA's Office of Pollution Prevention and Toxics to support the current PCB rules allowing for < 50 ppm PCB Remediation Wastes to be managed in non-TSCA units, the Agency again determined that such disposal would be protective of human health and the environment. In that report, EPA explained that:

The proposed regulation makes a number of changes in disposal requirements for remediation wastes: Wastes would be regulated on "as found" basis, instead of according to the original concentration of materials ... Wastes may be disposed *in the minimum technique necessary to protect human health and the environment*. Since much PCB remediation wastes are found in low concentrations (*including large quantities of wastes found in concentrations of less than 50 ppm*),

Ms. Suzanne Rudzinski
Office of Resource Conservation and Recovery
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substantial quantities will be disposed of in municipal solid waste landfills.

"Final Report: Costs of Compliance with the Proposed Amendments to the PCB Regulation," at 4-104 (December 6, 1994) (emphasis added) (excerpt attached hereto as Attachment C).

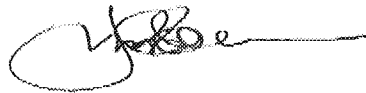
As evidenced by this report and by many provisions of the existing PCB regulations, EPA has already made the determination that PCBs at concentrations below 50 ppm do not pose an unreasonable risk to human health or the environment. Providing authorization to dispose of the PCB Remediation Wastes covered by this application in the same manner will therefore remove an unnecessary regulatory burden and promote voluntary cleanups in a manner that does not jeopardize human health or the environment.

* * * * *

Since TSCA's enactment and the subsequent promulgation of the PCB regulations, electric and natural gas utilities have remained steadily engaged with EPA in an effort to maintain compliance with the PCB regulations while managing PCB-containing equipment and wastes in a cost-effective manner that ensures reliable and safe service to the rate-paying public. The approval of this application will promote cleanups and facilitate compliance in a manner that does not present an unreasonable risk of injury to health or the environment while maintaining cost-effective and prudent disposal measures for this waste. Because EPA has already determined in the context of similarly situated parties managing identical PCB wastes that the management of < 50 ppm PCB Remediation Wastes in non-TSCA units does not pose an unreasonable risk of injury to health or the environment, the Agency should make the same finding here and grant this application pursuant to 40 C.F.R. § 761.61(c).

Thank you for your consideration. If you have questions regarding this application, please contact the undersigned or USWAG counsel Douglas Green (202-344-4483) or Allison Foley (202-344-4416) at Venable LLP.

Very truly yours,



James Roewer
Executive Director

Attachments

cc: David Hockey, ORCR, USEPA

#1209536

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Message

From: Johnson, Barnes [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C39E9338CBF04DC3B4B29F78E5213303-JOHNSON, BARNES]
Sent: 1/26/2018 9:53:45 PM
To: Roewer, James [JRoewer@eei.org]; Fawal, Margaret K. [MKFawal@Venable.com]; Doug Green [dhgreen@venable.com]
CC: Brown, Byron [brown.byron@epa.gov]; HAROLD D. REGISTER JR <HAROLD.REGISTERJR@cmsenergy.com> [HAROLD.REGISTERJR@cmsenergy.com]; Fotouhi, David [fotouhi.david@epa.gov]; Devlin, Betsy [Devlin.Betsy@epa.gov]; Elliott, Ross [Elliott.Ross@epa.gov]; Behan, Frank [Behan.Frank@epa.gov]; Michaud, John [Michaud.John@epa.gov]; Lewis, Jen [Lewis.Jen@epa.gov]; Celeste, Laurel [celeste.laurel@epa.gov]; ORCR IO [ORCR_IO@epa.gov]
Subject: RE: Confirmation of CCR Rule Groundwater Monitoring
Attachments: USWAG CCR LETTER_1_26_2018.pdf

Dear Jim, Doug and Margaret,

Enclosed, please find an interim reply to your letter. As always please feel free to reach out if you wish to discuss this further.

Sincerely,

Barnes Johnson

USEPA | Resource Conservation and Recovery | Tel 703-308-8895 |
johnson.barnes@epa.gov | [@EPALand](https://twitter.com/EPALand)

From: Roewer, James [mailto:JRoewer@eei.org]
Sent: Monday, November 27, 2017 8:06 AM
To: Fatouhi.david@epa.gov; Brown, Byron <brown.byron@epa.gov>; Johnson, Barnes <Johnson.Barnes@epa.gov>
Cc: Doug Green <dhgreen@venable.com>; Fawal, Margaret K. <MKFawal@Venable.com>; HAROLD D. REGISTER JR <HAROLD.REGISTERJR@cmsenergy.com> (HAROLD.REGISTERJR@cmsenergy.com)
<HAROLD.REGISTERJR@cmsenergy.com>
Subject: Confirmation of CCR Rule Groundwater Monitoring

David,

Attached is a letter seeking confirmation regarding the timing of the groundwater monitoring program as established by EPA's CCR rule (40 CFR Part 257, Subpart D).

USWAG members are committed to complying with all environmental regulations, including the CCR rule. Therefore, clarification of the rule's requirements—including confirmation of USWAG's reading of the requirements specific to groundwater monitoring—is critical.

We appreciate your attention to this matter.

Thank you,

Jim Roewer

Jim Roewer
Executive Director
USWAG



c/o Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, DC 20004-2098
202-508-5645
www.uswag.org



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

JAN 26 2018

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

Mr. James Roewer
c/o Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, D.C. 20004

Mr. Douglas Green
Ms. Margaret Fawal
Venable LLP
600 Massachusetts Avenue, NW
Washington, D.C. 20001

Re: Coal Combustion Residuals Rule Groundwater Monitoring Requirements

Dear Ms. Fawal, Mr. Green, and Mr. Roewer:

My office has been asked to respond to the letter from the Utility Solid Waste Activities Group (USWAG), dated November 27, 2017, to the U.S. Environmental Protection Agency (EPA), requesting confirmation with regard to your interpretation of the timing for two specific requirements in the Coal Combustion Residuals (CCR) Rule's groundwater monitoring provisions: (1) the timing to establish an assessment monitoring program if an owner/operator is unable to successfully make an alternate source demonstration in detection monitoring under 40 C.F.R. § 257.94(e)(2); and (2) the timing for conducting a statistical evaluation on the data collected under the assessment monitoring program. This responds in part to that November 27 letter.

I. Alternate Source Demonstration in Detection Monitoring

EPA agrees with your interpretation that the 90-day time period for conducting an alternate source demonstration in 40 C.F.R. § 257.94(e)(2) is separate from, and does not run concurrently with, the 90-day time frame in § 257.94(e)(1) or § 257.95(b).

40 C.F.R. § 257.94(e)(1) expressly provides that paragraph (e)(2) serves as an exception to the requirement that an owner or operator establish an assessment monitoring program within 90 days of detecting a statistically significant increase over background levels for any Appendix III constituent. ("Except as provided for in paragraph (e)(2) of this section, . . ."). Paragraph (e)(2) in turn provides that instead of initiating an assessment monitoring program within 90 days of such detection, the owner or operator may attempt to "demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase

resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.” The regulation further provides that, “[i]f a successful demonstration is completed within the 90-day period, the owner or operator of the CCR unit may continue with a detection monitoring program under this section.” If, at the end of that 90-day timeframe, the owner/operator is not able to successfully make this demonstration, the rule requires the owner/operator to “initiate an assessment monitoring program as required under § 257.95.”

Consistent with these provisions, EPA interprets 40 C.F.R. § 257.95(b) such that an assessment monitoring program is “triggered” either: (1) on the date an SSI is detected in a round of sampling taken under § 257.94(b) if an owner/operator elects not to make an alternate source demonstration under § 257.94(e)(2); or (2) at the end of the 90-day period in § 257.94(e)(2) if an owner/operator tries but cannot successfully make an alternate source demonstration under § 257.94(e)(2).

Note that this interpretation of the regulations mirrors the discussion of these provisions in the preamble to the final rule. As EPA explained,

The owner or operator has the opportunity to demonstrate that a source other than the CCR unit caused the statistically significant increase or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation or a natural variation in groundwater quality. Within 90 days, the owner or operator must prepare a report documenting this demonstration which must then be certified by a qualified professional engineer verifying the accuracy of the information in the report. If a successful demonstration is made within 90 days, the owner or operator may continue detection monitoring. If a successful demonstration is not made within 90 days, the owner or operator must initiate assessment monitoring.

Commenters raised concern that 90 days would not be sufficient to complete all of the activities necessary to determine whether the detection of an SSI was from another source than the CCR unit or was based on inaccurate results. The Agency recognizes that in some circumstances it could take more than 90 days to resample and have laboratories conduct new analyses, or to conduct field investigations to determine that another source is causing the contamination. As a result, § 257.94(e)(3) does not place an ultimate time limit for owners and operators to complete the demonstration. However, if after 90 days the owner or operator has not made a successful demonstration, (s)he must begin an assessment monitoring program.

80 Fed. Reg. 21,302, 21,404 (Apr. 17, 2015). *See also id.* at 21406 (contrasting the 90-day time period for making an alternate source demonstration pursuant to § 257.95(g)(3)(ii)).

2. Statistical Evaluation of Assessment Monitoring Data

USWAG also requested that EPA confirm your interpretation of the time frame for completing a statistical evaluation of the groundwater data collected during assessment monitoring in order to determine whether there is an exceedance of the groundwater protection standard. In your view, the regulations do not specify a specific timeframe for completing the statistical evaluation of these data. In support of this interpretation, you note that under § 257.95(b), the owner/operator must sample and analyze the groundwater for all appendix IV constituents within 90 days of triggering an assessment monitoring program; and that under § 257.95(d)(1), within 90 days of obtaining the results under § 257.95(b), the owner/operator must resample and analyze the groundwater for all appendix III constituents and those appendix IV constituents detected in § 257.95(b). The regulations then require the owner/operator to initiate an assessment of corrective measures within 90 days of detecting an appendix IV constituent at a

statistically significant level above the groundwater protection standard (40 C.F.R. § 257.95(g)(3)). On this basis, USWAG interprets the regulation to provide, at a minimum, that owners/operators have 90 days to conduct the statistical evaluation following completion of the sampling and analysis in § 257.95(d)(1).

EPA is still considering the issues you have raised regarding these provisions of the CCR Rule, and is therefore not in a position to provide a response at this time. I understand the need to provide timely guidance to facilities and will communicate EPA's views as soon as is feasible.

In the interim, if you have questions regarding this letter, please contact me at (703) 308-8895 or Frank Behan at (703) 308-8476.

Sincerely,

A handwritten signature in black ink, appearing to read "Barnes Johnson", with a stylized, flowing script.

Barnes Johnson, Director
Office of Resource Conservation and Recovery

Message

From: Roewer, James [JRoewer@eei.org]
Sent: 11/27/2017 1:19:22 PM
To: Fotouhi, David [fotouhi.david@epa.gov]; Brown, Byron [brown.byron@epa.gov]; Johnson, Barnes [Johnson.Barnes@epa.gov]
CC: Doug Green [dhgreen@venable.com]; Fawal, Margaret K. [MKFawal@Venable.com]; HAROLD D. REGISTER JR <HAROLD.REGISTERJR@cmsenergy.com> (HAROLD.REGISTERJR@cmsenergy.com) [HAROLD.REGISTERJR@cmsenergy.com]
Subject: FW: Confirmation of CCR Rule Groundwater Monitoring
Attachments: CRRRuleGWMonitoring11272017.pdf

David,

Attached is a letter seeking confirmation regarding the timing of the groundwater monitoring program as established by EPA's CCR rule (40 CFR Part 257, Subpart D).

USWAG members are committed to complying with all environmental regulations, including the CCR rule. Therefore, clarification of the rule's requirements—including confirmation of USWAG's reading of the requirements specific to groundwater monitoring—is critical.

We appreciate your attention to this matter.

Thank you,

Jim Roewer

Jim Roewer
Executive Director
USWAG



c/o Edison Electric Institute
701 Pennsylvania Avenue, NE
Washington, DC 20004-3696
202-508-5645
www.uswag.org

November 27, 2017

Via Email

David Fatouhi
Deputy General Counsel
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code: 2310A
Washington, DC 20460
fatouhi.david@epa.gov

Mr. Fatouhi,

I am writing on behalf of the Utility Solid Waste Activities Group (USWAG) regarding implementation of the groundwater monitoring program in the Environmental Protection Agency's coal combustion residuals (CCR) rule (40 CFR Part 257, Subpart D). Specifically, I am seeking confirmation regarding the timing of certain requirements that must be taken under the CCR rule's groundwater monitoring provisions. USWAG members, and the industry in general, are committed to complying with all environmental regulations, including the CCR rule. Therefore, clarification of the rule's requirements—including confirmation of USWAG's reading of the requirements specific to groundwater monitoring—is critical.

The CCR rule's groundwater monitoring program utilizes a phased approach, which provides for a graduated response over time to groundwater contamination as the evidence of such contamination increases. Owners and operators of CCR units were required to initiate the first phase of the groundwater program, detection monitoring (40 C.F.R. § 257.94), by October 17, 2017. Depending on the results of the groundwater sampling and analysis and statistical evaluation in detection monitoring, the next phase of the groundwater program, assessment monitoring, could be triggered as soon as January 15, 2018.¹ Because of the significant implications of assessment monitoring (*e.g.*, corrective action and/or forced closure

¹ Under § 257.93(h)(2), owners/operators have 90 days from sampling and analysis to run the statistical evaluation in detection monitoring. Because § 257.90(b)(1)(iv) requires an owner/operator to begin evaluating the data by October 17, 2017, the rule contemplates that the statistical evaluation will be completed by January 15, 2018.

of unlined surface impoundments), it is critical that EPA provide confirmation on the timing of each groundwater monitoring phase so that owners and operators can appropriately implement the rule's requirements going forward.

USWAG seeks confirmation with regard to its interpretation of the timing for two specific requirements in the CCR rule's groundwater monitoring program: (1) the timing to establish an assessment monitoring program if an owner/operator is unable to successfully make an alternate source demonstration in detection monitoring under § 257.94(e)(2); and (2) the timing for conducting a statistical evaluation on the data collected under the assessment monitoring program. USWAG's interpretation of the timing for each of these specific requirements, and the basis for that interpretation, is provided below. In addition, to help illustrate USWAG's interpretation, I have attached a diagram and two charts, outlining the timeframes in the rule's groundwater monitoring program.

1. Alternate Source Demonstration in Detection Monitoring

Under § 257.94(e)(1), if an owner/operator detects a statistically significant increase (SSI) above background levels for an appendix III constituent during detection monitoring, the owner/operator must within 90 days of detecting the SSI proceed to establish a groundwater assessment monitoring program meeting the requirements of § 257.95. However, § 257.94(e)(2) allows the owner/operator 90 days to demonstrate that the SSI was caused by a source other than the CCR unit or resulted from an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality (referred to here as an "alternate source demonstration"). If, at the end of that 90-day timeframe, the owner/operator is not able to successfully make this demonstration, the rule requires the owner/operator to "initiate an assessment monitoring program as required under § 257.95."

Under § 257.95(b), an owner/operator must within 90 days of "triggering" an assessment monitoring program, sample and analyze the groundwater for all appendix IV constituents. USWAG interprets the term "triggering" as occurring either: (1) if an owner/operator elects not to make an alternate source demonstration under § 257.94(e)(2), on the date an SSI is detected in a round of sampling taken under § 257.94(b); or (2) if an owner/operator tries but is unable to successfully make an alternate source demonstration under § 257.94(e)(2), at the end of the 90-day period in § 257.94(e)(2). In other words, the 90-day time period for conducting an alternate source demonstration in § 257.94(e)(2) is separate from, and does not run concurrently with, the 90-day time frame in § 257.94(e)(1) or § 257.95(b).²

² USWAG notes that this is in contrast to the 90-day time period for making an alternate source demonstration when an assessment of corrective measures is triggered in the assessment monitoring program (§ 257.95(g)(3)(ii)). EPA makes clear in the preamble to the rule, that—unlike the alternate

We would appreciate your confirmation that our understanding of the timing in § 257.94(e)(2) is correct.

2. Statistical Evaluation of Assessment Monitoring Data

Throughout the groundwater monitoring requirements, EPA distinguishes between the sampling and analysis of groundwater and the statistical evaluation of the data obtained through sampling and analysis. For example, under the detection monitoring program, the rule allows 90 days to complete the statistical evaluation after sampling and analysis is complete. *See* 40 C.F.R. § 257.93(h)(2). EPA explains in the preamble that it agreed with commenters that “90 days would be a reasonable amount of time to complete the statistical analysis to determine whether an exceedance had occurred.” 80 Fed. Reg. at 21403. *See also* 257.94(e)(2) (allowing the owner/operator to demonstrate that an SSI resulting from an error in *sampling, analysis, [or] statistical evaluation . . .*) (emphasis added).

In assessment monitoring, however, the rule does not specify a specific timeframe for completing the statistical evaluation of the data. Instead, under § 257.95(b), the owner/operator must *sample and analyze* the groundwater for all appendix IV constituents within 90 days of triggering an assessment monitoring program; and under § 257.95(d)(1), within 90 days of obtaining the results under § 257.95(b), the owner/operator must *resample and analyze* the groundwater for all appendix III constituents and those appendix IV constituents detected in § 257.95(b). The rule then jumps ahead, requiring the owner/operator to initiate an assessment of corrective measures within 90 days of detecting an appendix IV constituent at a statistically significant level above the groundwater protection standard (§ 257.95(g)(3)). Again, however, the rule does not specify a deadline for conducting the statistical evaluation for determining whether there is an exceedance of the groundwater protection standard.

USWAG believes that, at a minimum, owners/operators have 90 days to conduct the statistical evaluation following completion of the sampling and analysis in § 257.95(d)(1). This timeframe would be consistent with the 90-day time period provided for detection monitoring in § 257.93(h)(2), and with EPA’s explanation and reasoning in the preamble.

We would appreciate your confirmation that this interpretation of the timing for assessment monitoring is correct.

source demonstration timing in detection monitoring—the time period in § 257.95(g)(3)(ii) runs concurrently with the 90-day time period in § 257.96(a) for initiating an assessment of corrective measures. 80 Fed. Reg. 21302, 21406 (Apr. 17, 2015).

David Fatouhi
U.S. Environmental Protection Agency
Page 4 of 4

* * * *

Thank you in advance for your prompt attention to this matter. If you have any questions regarding the issues raised in this letter, please contact me at jim.roewer@uswag.org or (202) 508-5645.

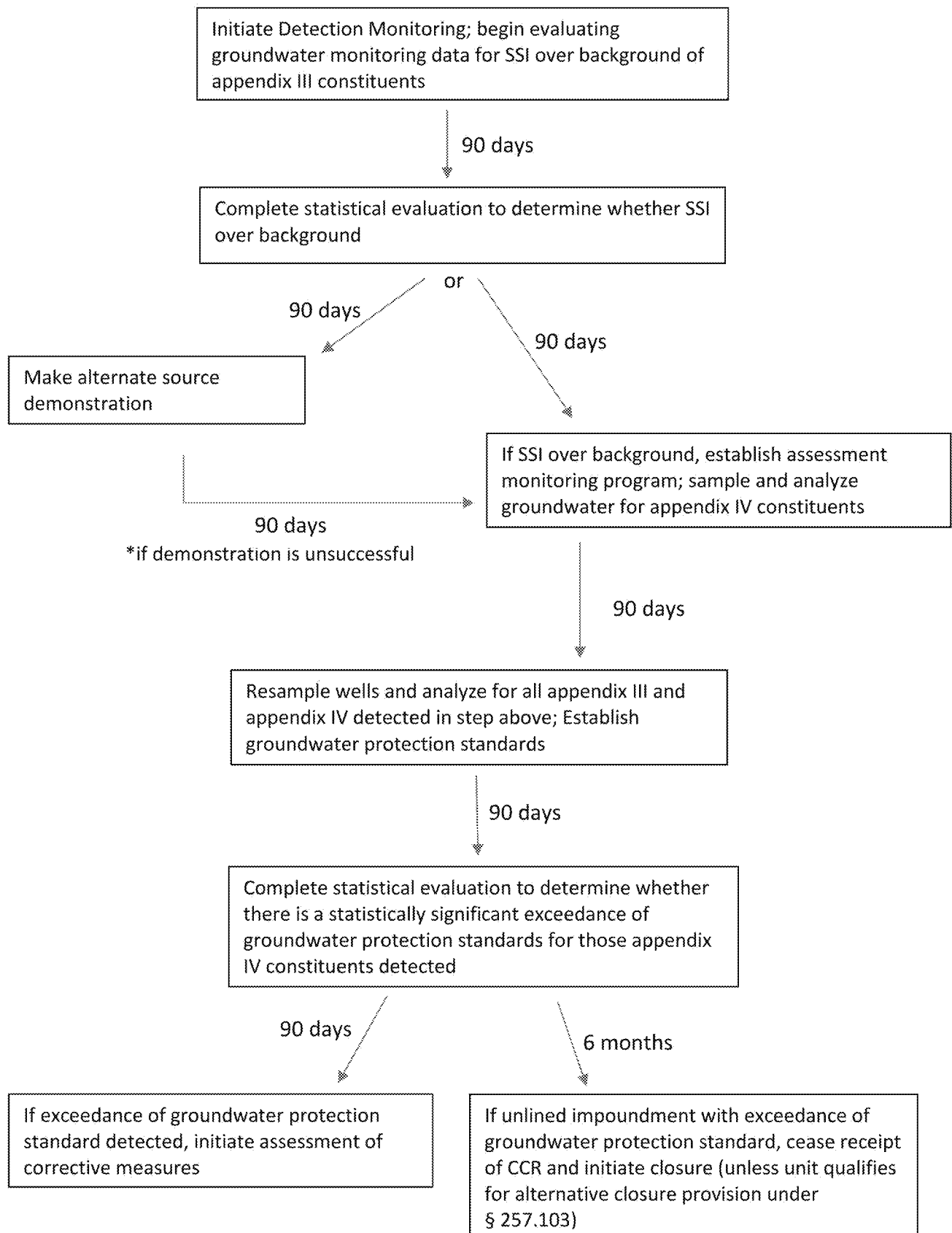
Sincerely,

A handwritten signature in black ink, appearing to read 'J. Roewer', with a large, stylized initial 'J' and a horizontal line extending to the right.

James Roewer
USWAG Executive Director

cc: Byron Brown
Barnes Johnson

Groundwater Monitoring Flow Chart



Timeline for Facilities That Elect to Make an Alternate Source Demonstration Under § 257.94(e)(2)			
Triggering Event	Action Required due to Triggering Event	Time Frame to Complete Action*	Regulatory Citation
Deadline for groundwater monitoring program	Install groundwater monitoring system, develop program, initiate detection monitoring and begin evaluating for statistically significant increase (SSI) over background.	October 17, 2017	§ 257.90(b) § 257.94(b)
Initiation of groundwater monitoring program	Complete statistical evaluation to determine if there is an SSI over background for Appendix III constituents.	90 days (January 15, 2018)	§ 257.93(h)(2)
SSI in detection monitoring	Demonstrate SSI was result of error or other source ("alternate source demonstration").	90 days (April 15, 2018)	§ 257.94(e)(2)
Failure to demonstrate SSI was result of error or other source under § 257.94(e)(2)	Establish assessment monitoring program; sample and analyze groundwater for appendix IV constituents.	90 days (July 14, 2018)	§ 257.95(b)
Results obtained from samples taken under § 257.95(b)	Resample all wells and conduct analyses for all Appendix III constituents and those Appendix IV constituents detected in the step above.	90 days (October 12, 2018)	§ 257.95(d)(1)
Results obtained from samples taken under § 257.95(d)(1)	Complete statistical evaluation to determine whether there is an exceedance of groundwater protection standards for appendix IV constituents detected.	90 days (January 10, 2019)	Unspecified; assume 90 days
Appendix IV constituent detected at statistically significant level above GPS in assessment monitoring	Initiate assessment of corrective measures or demonstrate that exceedance of GPS was error or caused by other source.	90 days (April 10, 2019)	§ 257.95(g)(3)
For unlined CCR impoundments, an Appendix IV constituent detected at statistically significant level above GPS in assessment monitoring	Cease receipt of CCR and initiate closure of impoundment (unless the unit qualifies for the rule's alternative closure provision under § 257.103).	6 months (July 10, 2019)	§ 257.95(g)(5); § 257.101(a)(1)

*Specific dates provided assume that there is an SSI over background in the first round of detection monitoring and an exceedance of a groundwater protection standard in the first round of assessment monitoring.

Timeline for Facilities That DO NOT Elect to Make an Alternate Source Demonstration Under § 257.94(e)(2)			
Triggering Event	Action Required due to Triggering Event	Time Frame to Complete Action*	Regulatory Citation
Deadline for groundwater monitoring program	Install groundwater monitoring system, develop program, initiate detection monitoring and begin evaluating for statistically significant increase (SSI) over background.	October 17, 2017	§ 257.90(b) § 257.94(b)
Initiation of groundwater monitoring program	Complete statistical evaluation to determine if there is SSI over background for Appendix III constituents.	90 days (January 15, 2018)	§ 257.93(h)(2)
SSI in detection monitoring	Establish assessment monitoring program; sample and analyze groundwater for appendix IV constituents.	90 days (April 15, 2018)	§ 257.95(b)
Results obtained from samples taken under § 257.95(b)	Resample all wells and conduct analyses for all Appendix III constituents and those Appendix IV constituents detected in the step above.	90 days (July 14, 2018)	§ 257.95(d)(1)
Results obtained from samples taken under § 257.95(d)(1)	Complete statistical evaluation to determine if there is an exceedance of groundwater protection standards for appendix IV constituents detected.	90 days (October 12, 2018)	Unspecified; assume 90 days
Appendix IV constituent detected at statistically significant level above GPS in assessment monitoring	Initiate assessment of corrective measures or demonstrate that exceedance of GPS was error or caused by other source.	90 days (January 10, 2019)	§ 257.95(g)(3)
For unlined CCR impoundments, an Appendix IV constituent detected at statistically significant level above GPS in assessment monitoring	Cease receipt of CCR and initiate closure of impoundment (unless unit qualifies for the rule's alternative closure provision under § 257.103).	6 months (April 12, 2019)	§ 257.95(g)(5); § 257.101(a)(1)

*Specific dates provided assume that there is an SSI over background in the first round of detection monitoring and an exceedance of a groundwater protection standard in the first round of assessment monitoring.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

JAN 26 2018

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

Mr. James Roewer
c/o Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, D.C. 20004

Mr. Douglas Green
Ms. Margaret Fawal
Venable LLP
600 Massachusetts Avenue, NW
Washington, D.C. 20001

Re: Coal Combustion Residuals Rule Groundwater Monitoring Requirements

Dear Ms. Fawal, Mr. Green, and Mr. Roewer:

My office has been asked to respond to the letter from the Utility Solid Waste Activities Group (USWAG), dated November 27, 2017, to the U.S. Environmental Protection Agency (EPA), requesting confirmation with regard to your interpretation of the timing for two specific requirements in the Coal Combustion Residuals (CCR) Rule's groundwater monitoring provisions: (1) the timing to establish an assessment monitoring program if an owner/operator is unable to successfully make an alternate source demonstration in detection monitoring under 40 C.F.R. § 257.94(e)(2); and (2) the timing for conducting a statistical evaluation on the data collected under the assessment monitoring program. This responds in part to that November 27 letter.

I. Alternate Source Demonstration in Detection Monitoring

EPA agrees with your interpretation that the 90-day time period for conducting an alternate source demonstration in 40 C.F.R. § 257.94(e)(2) is separate from, and does not run concurrently with, the 90-day time frame in § 257.94(e)(1) or § 257.95(b).

40 C.F.R. § 257.94(e)(1) expressly provides that paragraph (e)(2) serves as an exception to the requirement that an owner or operator establish an assessment monitoring program within 90 days of detecting a statistically significant increase over background levels for any Appendix III constituent. ("Except as provided for in paragraph (e)(2) of this section, . . ."). Paragraph (e)(2) in turn provides that instead of initiating an assessment monitoring program within 90 days of such detection, the owner or operator may attempt to "demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase

resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.” The regulation further provides that, “[i]f a successful demonstration is completed within the 90-day period, the owner or operator of the CCR unit may continue with a detection monitoring program under this section.” If, at the end of that 90-day timeframe, the owner/operator is not able to successfully make this demonstration, the rule requires the owner/operator to “initiate an assessment monitoring program as required under § 257.95.”

Consistent with these provisions, EPA interprets 40 C.F.R. § 257.95(b) such that an assessment monitoring program is “triggered” either: (1) on the date an SSI is detected in a round of sampling taken under § 257.94(b) if an owner/operator elects not to make an alternate source demonstration under § 257.94(e)(2); or (2) at the end of the 90-day period in § 257.94(e)(2) if an owner/operator tries but cannot successfully make an alternate source demonstration under § 257.94(e)(2).

Note that this interpretation of the regulations mirrors the discussion of these provisions in the preamble to the final rule. As EPA explained,

The owner or operator has the opportunity to demonstrate that a source other than the CCR unit caused the statistically significant increase or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation or a natural variation in groundwater quality. Within 90 days, the owner or operator must prepare a report documenting this demonstration which must then be certified by a qualified professional engineer verifying the accuracy of the information in the report. If a successful demonstration is made within 90 days, the owner or operator may continue detection monitoring. If a successful demonstration is not made within 90 days, the owner or operator must initiate assessment monitoring.

Commenters raised concern that 90 days would not be sufficient to complete all of the activities necessary to determine whether the detection of an SSI was from another source than the CCR unit or was based on inaccurate results. The Agency recognizes that in some circumstances it could take more than 90 days to resample and have laboratories conduct new analyses, or to conduct field investigations to determine that another source is causing the contamination. As a result, § 257.94(e)(3) does not place an ultimate time limit for owners and operators to complete the demonstration. However, if after 90 days the owner or operator has not made a successful demonstration, (s)he must begin an assessment monitoring program.

80 Fed. Reg. 21,302, 21,404 (Apr. 17, 2015). *See also id.* at 21406 (contrasting the 90-day time period for making an alternate source demonstration pursuant to § 257.95(g)(3)(ii)).

2. Statistical Evaluation of Assessment Monitoring Data

USWAG also requested that EPA confirm your interpretation of the time frame for completing a statistical evaluation of the groundwater data collected during assessment monitoring in order to determine whether there is an exceedance of the groundwater protection standard. In your view, the regulations do not specify a specific timeframe for completing the statistical evaluation of these data. In support of this interpretation, you note that under § 257.95(b), the owner/operator must sample and analyze the groundwater for all appendix IV constituents within 90 days of triggering an assessment monitoring program; and that under § 257.95(d)(1), within 90 days of obtaining the results under § 257.95(b), the owner/operator must resample and analyze the groundwater for all appendix III constituents and those appendix IV constituents detected in § 257.95(b). The regulations then require the owner/operator to initiate an assessment of corrective measures within 90 days of detecting an appendix IV constituent at a

statistically significant level above the groundwater protection standard (40 C.F.R. § 257.95(g)(3)). On this basis, USWAG interprets the regulation to provide, at a minimum, that owners/operators have 90 days to conduct the statistical evaluation following completion of the sampling and analysis in § 257.95(d)(1).

EPA is still considering the issues you have raised regarding these provisions of the CCR Rule, and is therefore not in a position to provide a response at this time. I understand the need to provide timely guidance to facilities and will communicate EPA's views as soon as is feasible.

In the interim, if you have questions regarding this letter, please contact me at (703) 308-8895 or Frank Behan at (703) 308-8476.

Sincerely,

A handwritten signature in black ink, appearing to read "Barnes Johnson", with a stylized, flowing script.

Barnes Johnson, Director
Office of Resource Conservation and Recovery

Message

From: Johnson, Barnes [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C39E9338CBF04DC3B4B29F78E5213303-JOHNSON, BARNES]
Sent: 5/2/2018 1:09:10 PM
To: 'Roewer, James' [JRoewer@eei.org]; 'Fawal, Margaret K.' [MKFawal@Venable.com]; 'Doug Green' [dhgreen@venable.com]
CC: Brown, Byron [brown.byron@epa.gov]; 'HAROLD D. REGISTER JR <HAROLD.REGISTERJR@cmsenergy.com> (HAROLD.REGISTERJR@cmsenergy.com)' [HAROLD.REGISTERJR@cmsenergy.com]; Fotouhi, David [fotouhi.david@epa.gov]; Devlin, Betsy [Devlin.Betsy@epa.gov]; Elliott, Ross [Elliott.Ross@epa.gov]; Michaud, John [Michaud.John@epa.gov]; Lewis, Jen [Lewis.Jen@epa.gov]; Celeste, Laurel [celeste.laurel@epa.gov]; ORCR IO [ORCR_IO@epa.gov]; Cook, Steven [cook.steven@epa.gov]; Breen, Barry [Breen.Barry@epa.gov]; Yonce, Stacey [yonce.stacey@epa.gov]
Subject: CCR Rule Groundwater Monitoring Timing
Attachments: Groundwater Monitoring Response Letter to USWAG 4_30_18.pdf

Dear Jim, Doug and Margaret,

Enclosed, please find our second and final reply to your letter that posed questions regarding groundwater monitoring for coal combustion residuals. As always please feel free to reach out if you wish to discuss this further.

Sincerely,

Barnes Johnson

USEPA | Resource Conservation and Recovery | Tel 703-308-8895 |
johnson.barnes@epa.gov | [@EPALand](#)

From: Roewer, James [<mailto:JRoewer@eei.org>]
Sent: Monday, November 27, 2017 8:06 AM
To: Fatouhi.david@epa.gov; Brown, Byron <brown.byron@epa.gov>; Johnson, Barnes <Johnson.Barnes@epa.gov>
Cc: Doug Green <dhgreen@venable.com>; Fawal, Margaret K. <MKFawal@Venable.com>; HAROLD D. REGISTER JR <HAROLD.REGISTERJR@cmsenergy.com> (HAROLD.REGISTERJR@cmsenergy.com)
<HAROLD.REGISTERJR@cmsenergy.com>
Subject: Confirmation of CCR Rule Groundwater Monitoring

David,

Attached is a letter seeking confirmation regarding the timing of the groundwater monitoring program as established by EPA's CCR rule (40 CFR Part 257, Subpart D).

USWAG members are committed to complying with all environmental regulations, including the CCR rule. Therefore, clarification of the rule's requirements—including confirmation of USWAG's reading of the requirements specific to groundwater monitoring—is critical.

We appreciate your attention to this matter.

Thank you,

Jim Roewer

Jim Roewer

Executive Director
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 30 2018

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE
NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

James Roewer
c/o Edison Electric Institute
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Douglas Green
Margaret Fawal
Venable LLP
600 Massachusetts Avenue, N.W.
Washington, D.C. 20001

Re: Coal Combustion Residuals Rule Groundwater Monitoring Requirements

Dear Ms. Fawal, Mr. Green, and Mr. Roewer:

My office has been asked to respond to the letter from the Utility Solid Waste Activities Group (USWAG), dated November 27, 2017, to the U.S. Environmental Protection Agency (EPA), requesting confirmation with regard to your reading of the timing for two specific requirements in the Coal Combustion Residuals (CCR) Rule's groundwater monitoring provisions: (1) the timing to establish an assessment monitoring program if an owner/operator is unable to successfully make an alternate source demonstration in detection monitoring under 40 C.F.R. § 257.94(e)(2); and (2) the timing for conducting a statistical evaluation on the data collected under the assessment monitoring program. On January 26, 2018, we provided an initial response that addressed the first issue raised in your letter. This letter responds to the remainder of that November 27 letter.

USWAG requested confirmation of its reading of the time frame for completing a statistical evaluation of the groundwater data collected during assessment monitoring in order to determine whether there is an exceedance of the groundwater protection standard. Your letter suggests that January 10, 2019, is the date by which facilities must make their initial determination of whether there has been the detection of a statistically significant increase of an Appendix IV constituent above the relevant groundwater protection standard in the downgradient wells (assuming the facility has elected to take 90 days pursuant to § 257.94(e)(2) to demonstrate that detection of the Appendix III constituent(s) was attributable to sampling error or some other source).

As explained below, EPA calculates January 14, 2019,¹ as the deadline for facilities² to make their initial determination of whether there has been the detection of a statistically significant increase of an Appendix IV constituent above the relevant groundwater protection standard in the downgradient wells (assuming the facility has elected to take advantage of the 90 day option in § 257.94(e)(2)).

Section 257.95 generally establishes the schedule and framework for conducting the sampling and analysis required for assessment monitoring, but does not include a specific timeframe for completing the statistical evaluation of these data to determine whether there is an exceedance of the groundwater protection standard. The timeframe for that requirement instead appears in 40 C.F.R. § 257.93(h), which EPA reads to apply to the statistical analyses required under both detection and assessment monitoring. Taken together, these sections establish that the first deadline for completing the statistical evaluation of the assessment monitoring data to determine whether there is an exceedance of the groundwater protection standard is 90 days after completion of the re-sampling and analysis in § 257.95(d)(1).

Section 257.95(b) provides that within 90 days of triggering assessment monitoring (and on an annual basis thereafter) the owner/operator must sample and analyze for all Appendix IV constituents. For any Appendix IV constituents detected in the sampling and analysis required under subsection (b) the owner/operator must: (1) identify (“establish”) the relevant groundwater protection standards specified in § 257.95(h); (2) continue assessment monitoring by resampling for all Appendix III and the relevant (detected) Appendix IV constituents and (3) obtain analytical results of those combined samples within 90 days. 40 C.F.R. § 257.95(d)(1)-(2).

Section 257.93(h) states that an owner or operator “must determine whether there is a statistically significant increase over background values for each constituent required in the particular groundwater monitoring program that applies to the CCR unit, as determined under § 257.94(a) or § 257.95(a).” 40 C.F.R. § 257.93(h). Section (h)(2) in turn specifies that “within 90 days after completing sampling and analysis, the owner or operator must determine whether there has been a statistically significant increase over background for any constituent at each monitoring well.” The determination of whether there has been a statistically significant increase over background is a necessary prerequisite to determining whether there is an exceedance of the groundwater protection standard. A determination that there has been a statistically significant increase over background indicates that there is a release from the unit and requires that the release be evaluated further to determine if it also exceeds the groundwater protection standard. See 40 C.F.R. § 257.95(f).

Thus, 90 days after completing the resampling for the relevant (detected) Appendix IV constituents pursuant to § 257.95(d)(1), an owner or operator must conduct a statistical analysis in accordance with § 257.93(h).³ For example, assuming that the facility did not take advantage of the 90 day option in § 257.94(e)(2), the first round of Assessment monitoring would have been completed on April 16, 2018. In this case, consistent with § 257.93(h), the facility would need to complete the

¹ In calculating this date, EPA extended any deadlines that fell on a weekend or Federal holiday to the next business day.

² This excludes those inactive surface impoundments whose deadlines were extended by 81 Fed. Reg. 51,803 (Aug. 5, 2016).

³ Note that conducting the statistical analysis on 2 sets of sampling occurs only on this first round (the “initial...sampling events” referenced in § 257.95(d)(1)) of Assessment monitoring. All other statistical analyses on subsequent rounds of on-going semi-annual or annual sampling under assessment monitoring must be conducted following the single set of samples obtained during that sampling event.

statistical analyses on the two rounds of sampling to determine whether there is a statistically significant increase over the groundwater protection standard no later than October 15, 2018.

EPA's discussion of section 257.93(h)(2) in the final rule preamble supports this reading. As EPA explained, "[s]everal commenters suggested that *once sampling and analysis had been completed*, 90 days would be a reasonable amount of time to complete the statistical analysis to determine whether an exceedance had occurred. No commenter suggested a longer period of time was necessary and that timeframe is consistent with the Agency's experience of the timeframes necessary to complete such analyses. Accordingly, *we have revised the provision to require the determination of a statistically significant increase to be made within 90 days of sampling and analysis.*" 80 Fed. Reg. at 21,404 (emphases added).

If you have any additional questions regarding this letter, please contact me at (703) 308-8895 or at johnson.barnes@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Barnes Johnson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Barnes Johnson, Director
Office of Resource Conservation and Recovery

Message

From: Roewer, James [JRoewer@eei.org]
Sent: 8/24/2018 3:44:28 PM
To: Cook, Steven [cook.steven@epa.gov]
CC: 'ajwallisch@venable.com' [ajwallisch@venable.com]
Subject: CERCLA 108(b)
Attachments: USWAG108bSCook08242018.pdf; UtilityNPLSites.xlsx

Steven,

Attached please find a letter (with attachment) in follow up on our discussion with you and your staff on April 20th regarding EPA's rulemaking to determine whether to impose financial responsibility requirements pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") § 108(b) on the electric power industry. 82 Fed. Reg. 3512 (Jan. 11, 2017).

As we discussed at that meeting, USWAG is interested in having our industry be the next business sector considered by EPA as you evaluate each of the three identified industries in the notice (*i.e.*, the chemical, petroleum and electric power industries) to determine whether CERCLA financial responsibility is warranted.

We appreciate the opportunity to address these issues with you and your staff and to provide this background on our industry. Please contact me with any questions.

Jim

Jim Roewer
Executive Director
USWAG



c/o Edison Electric Institute
701 Pennsylvania Avenue, NW
Washington, DC 20004-2696
202-508-5645
www.uswag.org

August 24, 2018

Via Overnight and Electronic Mail

Steven Cook
Deputy Assistant Administrator,
Office of Land and Emergency Management
U.S. Environmental Protection Agency
Mail Code 5101T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Rulemaking on CERCLA Financial Responsibility for the Electric
Power Industry

Dear Mr. Cook:

I am writing on behalf of the Utility Solid Waste Activities Group ("USWAG")¹ to follow up on our discussion with you and your staff on April 20th regarding EPA's rulemaking to determine whether to impose financial responsibility requirements pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") § 108(b) on the electric power industry. 82 Fed. Reg. 3512 (Jan. 11, 2017). As we discussed at that meeting, USWAG is interested in having our industry be the next business sector considered by EPA as you evaluate each of the three identified industries in the notice (*i.e.*, the chemical, petroleum and electric power industries) to determine whether CERCLA financial responsibility is warranted. As we previously stated, we do not believe that these requirements are necessary for the electric power

¹ USWAG, formed in 1978, is an association of over one hundred and thirty electric utilities, power producers, utility operating companies, and utility service companies located throughout the United States, including the Edison Electric Institute ("EEI"), the American Public Power Association ("APPA"), and the National Rural Electric Cooperative Association ("NRECA"). Together, USWAG members represent more than 73% of the total electric generating capacity of the United States, and service more than 95% of the nation's consumers of electricity and 92% of the nation's consumers of natural gas.

industry, since there is only nominal risk that federal or state expenditures will be necessary to fund CERCLA cleanups from our industry's past, present or future operations. The imposition of these financial requirements would be an unwarranted burden given both the industry's strong record of fully funding all cleanup obligations without the use of public funds as well as EPA's 2015 rulemaking to address the risks from coal combustion residual units. We respond below to the specific information requests that you and your staff made about the makeup of our industry and regulatory backdrop that impacts the risks associated with CERCLA hazardous substances managed by our sector.

I. Any Review of the Electric Power Industry Should Focus on Only Those Facilities That Could Pose a Risk of Discharge of CERCLA Hazardous Substances

As an initial matter, we will address your request for information on the structure of the electric power industry. Currently, the electric power industry is made up of transmission, distribution, and generation facilities. Transmission and distribution facilities might exist as a separate company or be attached to a larger electric utility that may operate its own generation facilities. Generation facilities might also exist as a separate company or be a component of a larger energy company that has multiple wholly-owned units including both generation assets and electric utilit(ies) with transmission and distribution networks. Each of these components might exist as (i) an investor-owned utility that is a privately-owned, for-profit company, (ii) a federal power agency that is a publicly-owned power generator or supplier, (iii) a state or municipal power utility which is a publicly-owned not-for-profit governmental agency or municipal department producing or providing power, (iv) a rural cooperative that is a customer-owned not-for-profit power generator or supplier cooperative, or (v) a non-utility power producer that is a privately-owned for-profit power producer. Generation facilities are typically either coal, natural gas or fuel oil combustion plants; solar facilities; nuclear plants; hydroelectric facilities; or wind turbines.

Transmission and distribution facilities typically only have very limited volumes of hazardous substances on-site and certainly insufficient volumes to pose a risk that governmental organizations would need to provide cleanup funds. Solar facilities, hydroelectric plants and wind turbines also have extremely low volumes of CERCLA hazardous substances. Although natural gas and fuel oil combustion facilities could pose a risk of release of these substances, these materials are specifically excluded from the definition of a CERCLA hazardous substance as an exempted petroleum fraction and as a natural gas respectively. CERCLA § 101; 42 U.S.C. § 9601 (definition of "hazardous substance").

In terms of nuclear generation facilities, as we discussed during our meeting, they have a completely independent federal program to provide for liability and decommissioning coverage that acknowledges the unique nature of

nuclear power generation. The Price-Anderson Act established a federal program for liability insurance for property damage and personal injury caused by nuclear and radiological incidents. All nuclear power plants are also required to maintain a decommissioning fund to provide financial coverage for the decommissioning of a nuclear power plant site. EPA should not seek to duplicate this already comprehensive financial responsibility program and CERCLA § 108(b) requirements should not apply to these facilities.

Accordingly, of all the varieties of facilities in the electric power industry, only electric power generation facilities that combust coal pose any threat of releasing a CERCLA hazardous substance that might need to be covered through the provision of public funds. However, as we address below even this segment of our industry poses virtually no risk of a release that would need to be cleaned up through recourse to state or federal funds.

II. The Electric Power Industry Has Always Fully Funded CERCLA Cleanups and Additional Financial Assurance Requirements are Unnecessary

The electric power industry has a commendable history of reliably funding any and all CERCLA cleanups for which our industry was responsible. The CERCLA § 108(b) financial responsibility rulemakings are designed to ensure that sufficient financial resources are supplied by responsible parties and that the cleanup of CERCLA hazardous substance releases is not funded by state or federal resources. The fact that the electric power industry has *a/ways* covered the costs associated with CERCLA releases is powerful evidence that future risks are similarly extremely low.

Following our meeting with EPA this spring USWAG polled its member companies and conducted an independent review of the CERCLA National Priorities List (“NPL”) to determine whether any site owned or operated by the electric power industry was remediated through the use of public funds. We were unable to identify a single site for which our industry (or other potentially responsible parties) did not fully fund their cleanup obligations. Furthermore, the vast majority of these sites involved historical manufactured gas plant (“MGP”) sites (from a practice that ceased decades before the advent of environmental regulations in the United States) or involved federal military or energy facilities. The remediation of MGP sites, in fact, is a historical success as thousands of sites throughout the country were remediated by the electric power industry without public funding. See attached list of NPL sites owned or operated by the electric power industry.

This historical track record is a key consideration in determining whether to impose financial responsibility requirements on our industry. As EPA analyzes whether or not to impose CERCLA financial responsibility on the electric power industry, it should directly take into account that no state or federal funds have

ever actually been used to remediate CERCLA sites owned or operated by the electric power industry without being fully remunerated by the owner/operator of those sites. Indeed, it would appear that imposing financial responsibility requirements on our industry would be establishing a solution in search of a problem that would provide no additional remediation benefits. Furthermore, it would be difficult, if not impossible, to justify any costs imposed by additional financial responsibility requirements on the electric power industry, many of which already provide closure and/or post closure financial assurance through other pre-existing regulatory programs. A calculation of the purported benefits of these types of regulatory programs is typically derived by extrapolating from the costs associated with historic harms. Since there are no harms associated with the use of state and federal funds to cleanup CERCLA releases from the electric power industry, any cost-benefit calculation of this rule would identify significant costs with only highly speculative future benefits.

To date, none of EPA's analyses of the appropriateness of imposing CERCLA financial responsibility requirements on our industry has assessed whether state and federal funds have actually ever been used to remediate CERCLA sites owned or operated by the electric power industry without being fully remunerated by the owner/operator of those sites. We maintain that this factor should be of critical importance to EPA's decision-making and should, alone, be sufficient evidence that imposing these requirements on our industry is unwarranted.

III. EPA Established Comprehensive Regulations to Address the Risk of Release from Coal-Fired Power Plants

Despite the electric power industry's excellent track record of always providing financial backing for any and all CERCLA cleanups involving our industry, you and your staff have asked questions about the risks associated with potential releases of coal combustion residuals ("CCRs"). Although incidents like those that occurred at the Tennessee Valley Authority's Kingston facility and Duke Energy's Dan River facility did involve large-scale releases of CCRs from electric power industry sites, both of these incidents were remediated by these companies without resorting to the use of public funds. Additionally, every historic release of CCRs and hazardous substances at our industry's facilities has been completely remediated without resort to public funding. This strongly suggests that, even if CCRs are released, they will be cleaned up without the need to rely on a financial assurance mechanism. Nonetheless, any concerns about the potential for future CCR releases should be even further obviated by EPA's development and finalization of the 2015 RCRA final rule comprehensively addressing CCRs at electric utilities and independent power producers ("CCR Rule"). 80 Fed. Reg. 21302 (April 17, 2015).

The Agency developed the CCR Rule to regulate CCR units at electric power industry facilities, at least in part, specifically to prevent future large-scale releases such as the Kingston and Dan River incidents. The CCR Rule establishes national minimum criteria for CCR disposed of in landfills and surface impoundments and sets performance standards to ensure CCR units “do not pose a reasonable probability of adverse effects on health or the environment.” Codified at 40 C.F.R. § 257.50(a). The CCR Rule’s requirements for landfills and surface impoundments include design criteria, structural integrity requirements, and location restrictions on separation from the uppermost aquifer, wetlands, fault areas, seismic impact zones and unstable areas. Operating criteria includes fugitive dust controls, run-on and run-off controls, hydrologic and hydraulic capacity requirements for surface impoundments, and detailed inspection requirements. The CCR Rule has extensive and prescriptive requirements for groundwater monitoring, corrective action, closure and 30 years of post-closure care. The CCR Rule mitigates the risk associated with structural failures of CCR landfills and surface impoundments as well as releases to groundwater from these units.

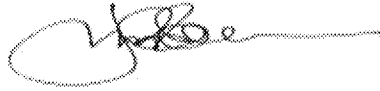
EPA squarely conducted this rulemaking to reduce the risk that the types of releases that occurred at the Kingston and Dan River facilities would occur in the future and to ensure that groundwater is properly monitored, and any migration of CCR constituents is detected and remediated. See e.g., 80 Fed. Reg. 21399. The regulatory requirements established by EPA substantially reduce any risk that surface impoundments and landfills will have releases of CCR that would require state or federal involvement, much less need state or federal funds for their cleanup.

As EPA analyzes the appropriateness of financial assurance requirements for the electric power industry under CERCLA § 108(b), EPA should limit its focus to only those facilities that combust coal, since those are the only facilities that have the potential for releasing hazardous substances that might need to be covered through the provision of public funds. Our industry has an exemplary track record of fully funding and completing all cleanup obligations without resorting to the use of public funds, and EPA’s RCRA rulemaking specifically addresses the risk from facilities that combust coal to ensure that there is no reasonable probability of adverse effects on human health or the environment from these facilities. We strongly suggest that these regulations also significantly reduce the “degree and duration of risk associated with the production, transportation, treatment, storage, or disposal of hazardous substances” (CERCLA § 108(b)(1)) and that financial responsibility requirements under CERCLA are not warranted. Accordingly, we respectfully request that EPA move expeditiously to issue a final rule determining that these requirements are unnecessary for the electric power industry.

* * * * *

We appreciate the opportunity to address these issues with you and your staff and to provide this background on our industry. If you have questions about these data or need any other information on the electric power industry or the CERCLA financial responsibility rulemaking, please contact me or USWAG counsel Aaron Wallisch (202-344-4474; ajwallisch@venable.com) at Venable LLP.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Roewer", with a long horizontal flourish extending to the right.

James R. Roewer
Executive Director

NAME	City	EPA Site ID	Date Listed	NPL Score	Federal Facility
Rocky Mountain Arsenal (USARMY)	Adams County, CO	CO5210020769	7/22/1987	58.15	Yes
Dover Gas Light Co.	Dover, DE	DED980693550	10/4/1989	35.57	No
Central Illinois Public Service Co.	Taylorville, IL	ILD981781065	8/30/1990	28.95	No
LaSalle Electric Utilities	La Salle, IL	ILD980794333	9/8/1983	42.06	No
Fairfield Coal Gasification Plant	Fairfield, IA	IAD981124167	8/30/1990	38.05	No
Mason City Coal Gasification Plant	Mason City, IA	IAD980969190	12/16/1994	69.33	No

Additional Information	Description - Responsible Entity	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (27 pp, 287 K)	FEDERAL FACILITY, NOT A UTILITY SITE	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (19 pp, 302 K)	MGP SITE - CHESAPEAKE UTILITIES AND FIRSTENERGY INVOLVED IN INVESTIGATIONS.	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (22 pp, 293 K)	MGP SITE- AMEREN RESPONSIBLE FOR CLEANUP	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (36 pp, 441 K)	CAPACITOR MANUFACTURER, NOT A UTILITY SITE	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (22 pp, 293 K)	MGP SITE - ALLIANT RESPONSIBLE FOR CLEANUP	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (13 pp, 100 K)	MGP SITE - ALLIANT RESPONSIBLE FOR CLEANUP	Site Location

Peoples Natural Gas Co.	Dubuque, IA	IAD980852578	8/30/1990	46.24	No
Iowa-Nebraska Light & Power Co	Norfolk, NE	NED986373678	4/7/2016	40.8	No
Gowanus Canal	Brooklyn, NY	NYN000206222	3/4/2010	50	No
Niagara Mohawk Power Corp. (Saratoga Spings Plant)	Saratoga Springs, NY	NYD980664361	2/21/1990	35.48	No
Savannah River Site (USDOE)	Aiken, SC	SC1890008989	11/21/1989	47.7	Yes
Utah Power & Light/American Barrel Co.	Salt Lake City, UT	UTD980667240	10/4/1989	37.93	No
Chisman Creek	York County, VA	VAD980712913	9/8/1983	47.19	No
Bremerton Gasworks	Bremerton, WA	WAN001002907	5/10/2012	50	No
Ashland/Northern States Power Lakefront	Ashland, WI	WISFN0507952	9/5/2002	50	No

Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (22 pp, 293 K)	MGP SITE - MIDWEST GAS CLEANED UP SITE	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (6 pp, 242 K)	MGP SITE - Black Hills/Nebraska Gas Utility Company AND NPPD CLEANED UP SITE	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (8 pp, 171 K)	MGP SITE AND OTHER INDUSTRIAL CONTAMINANTS - NATIONAL GRID REMEDIATING MGP SITES	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (21 pp, 326 K)	MGP SITE - NIAGARA MOHAWK RESPONSIBLE FOR CLEANUP	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (10 pp, 125 K)	RADIOACTIVE CONTAMINATION FROM GOVERNMENT FACILITY	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (19 pp, 302 K)	UTILITY POLE TREATMENT FACILITY AND DRUM STORAGE -- UTAH POWER & LIGHT AND AMERICAN DRUM RESPONSIBLE FOR CLEANUP	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (36 pp, 441 K)	FLY ASH DISPOSAL - VIRGINIA POWER (DOMINION ENERGY) CONDUCTED CLEANUP	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (7 pp, 241 K)	MGP SITE - CASCADE NATURAL GAS RESPONSIBLE FOR CLEANUP	Site Location
Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (9 pp, 193 K)	MGP SITE - NORTHERN STATES POWER (XCEL ENERGY) RESPONSIBLE FOR CLEANUP	Site Location

Mystery Bridge Rd/U.S. Highway 20	Evansville, WY	WYD981546005	8/30/1990	32.1	No
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Site Listing Narrative Site Progress Profile Federal Register Notice (PDF) (22 pp, 293 K)	NATURAL GAS PROCESSING SITE - KN ENERGY (KINDER MORGAN) AND DOW CHEMICAL RESPONSIBLE FOR CLEANUP	Site Location
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